Table of Contents

1. CSBG Cover Page (SF-424M) ........................................................................................................... 2
2. Section 1: CSBG Lead Agency, CSBG Authorized Official, CSBG Point of Contact, and Official State 
   Designation Letter ................................................................................................................................. 4
3. Section 2: State Legislation and Regulation ......................................................................................... 5
4. Section 3: State Plan Development and Statewide Goals ........................................................................ 6
5. Section 4: CSBG Hearing Requirements .............................................................................................. 8
6. Section 5: CSBG Eligible Entities .......................................................................................................... 9
7. Section 6: Organizational Standards for Eligible Entities ....................................................................... 10
8. Section 7: State Use of Funds ................................................................................................................ 11
9. Section 8: State Training and Technical Assistance .............................................................................. 14
10. Section 9: State Linkages and Communication .................................................................................... 16
11. Section 10: Monitoring, Corrective Action, and Fiscal Controls ............................................................. 19
12. Section 11: Eligible Entity Tripartite Board .......................................................................................... 22
13. Section 12: Individual and Community Eligibility Requirements ......................................................... 23
14. Section 13: Results Oriented Management and Accountability (ROMA) System ................................. 24
15. Section 14: CSBG Programmatic Assurances and Information Narrative ............................................. 25
16. Section 15: Federal Certifications ......................................................................................................... 28
**COVER PAGE**

1. **Type of Submission:** Plan  
   **Frequency:** Other (2 Year)  
   **Consolidated Application/Plan/Funding Request:** Yes  
   **Version:** Update  

2. **Date Received:** State Use Only:  

3. **Applicant Identifier:**  
   **Federal Entity Identifier:**  
   **Federal Award Identifier:**  
   **State Application Identifier:**  

4. **State Use Only:**  

5. **Applicant Information:**  
   **Legal Name:** State of Arizona  
   **Employer/Taxpayer Identification Number (EIN/TIN):** 174100028A1  
   **Organizational DUNS:** 136730434  
   **Address:**  
   - Street 1: 1789 West Jefferson Street  
   - Street 2: Mail Drop 6283  
   - City: Phoenix  
   - County: Maricopa  
   - State: AZ  
   - Country: United States  
   - Zip / Postal Code: 85005  
   **Organizational Unit:**  
   - Department Name: Arizona Department of Economic Security  
   - Division Name: Division of Aging and Adult Services  
   **Name and contact information of person to be contacted on matters involving this application:**  
   - Prefix:  
   - First Name: Diana  
   - Middle Name: Leigh  
   - Last Name: Gravett  
   - Telephone Number: (602) 542-6594  
   - Fax Number: (602) 542-6655  
   - Email: dgravett@azdes.gov  

6. **Organizational Unit:**  
   - Department Name: Arizona Department of Economic Security  
   - Division Name: Division of Aging and Adult Services  

7. **Application Information:**  
   **Additional Description:** Human Services Agency  

8. **Name of Federal Agency:**  
   **Catalog of Federal Domestic Assistance Number:** 93569  
   **CFDA Title:** Community Services Block Grant  

9. **Descriptive Title of Applicant's Project:** CSBG State Plan FFY’s 2017-2018  

10. **Areas Affected by Funding:**  
    - All counties in Arizona  

11. **Congressional Districts Of:**  
    - Applicant: AZ  
    - Program/Project: Community Action Program  

12. **Funding Period:**  
    **Start Date:**  
    **End Date:**  
    **Estimated Funding:**  
    **Federal ($):** 0  
    **Match ($):** 0  

13. **Is Submission Subject To Review By State Under Executive Order 12372 Process?**  
    - This submission was made available to the State under the Executive Order 12372.

Page 2
**Process for Review on:**

b. Program is subject to E.O. 12372 but has not been selected by State for review.

c. Program is not covered by E.O. 12372.

<table>
<thead>
<tr>
<th>*17. Is The Applicant Delinquent On Any Federal Debt?</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐ YES</td>
</tr>
<tr>
<td>☒ NO</td>
</tr>
</tbody>
</table>

**Explanation:**

18. By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001) **I Agree ✓

**The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

<table>
<thead>
<tr>
<th>18a. Typed or Printed Name and Title of Authorized Certifying Official</th>
<th>18c. Telephone (area code, number and extension)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>18d. Email Address</td>
</tr>
<tr>
<td>18b. Signature of Authorized Certifying Official</td>
<td>18e. Date Report Submitted (Month, Day, Year)</td>
</tr>
</tbody>
</table>

**Attach supporting documents as specified in agency instructions.**
### 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.

<table>
<thead>
<tr>
<th>1.1a. Lead agency</th>
<th>Arizona Department of Economic Security</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.1b. Cabinet or administrative department of this lead agency</td>
<td>Human Services Department</td>
</tr>
<tr>
<td>1.1c. Division, bureau, or office of the CSBG authorized official</td>
<td>Division of Aging and Adult Services</td>
</tr>
<tr>
<td>1.1d. Authorized official of lead agency</td>
<td>Henry Darwin (Interim)</td>
</tr>
<tr>
<td>1.1e. Street Address</td>
<td>1789 W Jefferson Street</td>
</tr>
<tr>
<td>1.1f. City</td>
<td>Phoenix</td>
</tr>
<tr>
<td>1.1g. State AZ</td>
<td>AZ</td>
</tr>
<tr>
<td>1.1h. Zip</td>
<td>85007</td>
</tr>
<tr>
<td>1.1i. Telephone number and extension</td>
<td>(602) 542 - 5757 ext.</td>
</tr>
<tr>
<td>1.1j. Fax number:</td>
<td>(602) 542 - 5339</td>
</tr>
<tr>
<td>1.1k. Email address</td>
<td><a href="mailto:director@azdes.gov">director@azdes.gov</a></td>
</tr>
<tr>
<td>1.1l. Lead agency website</td>
<td><a href="https://des.az.gov">https://des.az.gov</a></td>
</tr>
</tbody>
</table>

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

<table>
<thead>
<tr>
<th>1.2a. Agency name</th>
<th>Department of Economic Security</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.2b. Name of the point of contact</td>
<td>Tamberly Frazee</td>
</tr>
<tr>
<td>1.2c. Street address</td>
<td>1789 W Jefferson Street</td>
</tr>
<tr>
<td>1.2d. City</td>
<td>Phoenix</td>
</tr>
<tr>
<td>1.2e. State AZ</td>
<td>AZ</td>
</tr>
<tr>
<td>1.2f. Zip</td>
<td>85007</td>
</tr>
<tr>
<td>1.2g. Point of contact telephone number</td>
<td>(602) 542 - 2895 ext.</td>
</tr>
<tr>
<td>1.2h. Fax number:</td>
<td>(602) 542 - 6655</td>
</tr>
<tr>
<td>1.2i. Point of contact email address</td>
<td><a href="mailto:tfrazee@azdes.gov">tfrazee@azdes.gov</a></td>
</tr>
<tr>
<td>1.2j. Point of contact agency website</td>
<td><a href="https://des.az.gov">https://des.az.gov</a></td>
</tr>
</tbody>
</table>

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.
### Section 2: State Legislation and Regulation

<table>
<thead>
<tr>
<th>2.1. CSBG State Legislation:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Does the State have a statute authorizing CSBG?</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>2.2. CSBG State Regulation:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Does the State have regulations for CSBG?</td>
</tr>
</tbody>
</table>

2.3. If yes was selected in item 2.1 and/or 2.2, attach a copy (or copies) of legislation and/or regulations or provide a hyperlink(s), as appropriate.

Not applicable

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.

The Arizona Department of Economic Security (DES) is the designated State agency responsible for the administration of the CSBG as identified by the Governor. All activities of DES are the responsibility of the Director. Primary responsibility for CSBG program planning, development, contracting, reporting, and monitoring is delegated to the Division of Aging and Adult Services (DAAS), Community Action Programs and Services (CAPS). DES came under new administration in 2015 under newly elected Governor Douglas D. Ducey. In SFY 2017, Governor Ducey appointed Henry Darwin as Interim Director of the agency. The agency mission statement was revised in Federal Fiscal Year (FFY) 2015 to read as follows: “The Arizona Department of Economic Security makes Arizona stronger by helping Arizonans reach their potential through temporary assistance for those in need, and care for the vulnerable.” DES administers the Unemployment Insurance (UI), Workforce Innovation and Opportunity (WIOA) Act programs, and the Supplemental Nutrition Assistance (SNAP) programs. The Agency also provides child support enforcement services and comprehensive programs to assist persons with developmental disabilities. The Division of Aging and Adult Services (DAAS) administers the Community Action Program, the State Adult Protective Services program, Refugee Resettlement Program, Aging and Disability Services (for seniors and persons with disabilities), the State Homeless Program, Low Income Home Energy Assistance (LIHEAP), Hunger Prevention and Domestic Violence Programs.

3.2. State Plan Goals:
Describe the State’s CSBG-specific goals for State administration of CSBG under this State Plan.

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

(a) DAAS/CAPS coordinates with the Arizona Community Action Program to provide training and technical assistance using State CSBG discretionary dollars. Providing training and technical assistance to those entities in need of such assistance and such activities will not be considered administrative expenses. (b) Coordinating state-operated programs and services targeted to low-income children individuals, and families with children, and at the option of the State, locally operated programs, and services, targeted to low-income individuals and families with children, children and families with services provided by eligible entities and other organizations funded under the CSBG Act, including out-posting appropriate state or local public employees into entities funded to ensure increased access to services provided by such state or local entities. (c) Supporting statewide coordination and communication among eligible entities; a portion of CSBG discretionary funds will be targeted to support statewide coordination and communication among eligible entities on a yearly basis that will be accomplished through support of the Community Action Agencies and the Arizona Community Action Association. (d) Analyzing the distribution of funds made available under the CSBG Act, to determine if such funds have been targeted to the areas of greatest need. The State utilizes a funding distribution formula that analyzes local rates of poverty and unemployment, accounts for rural factors and tribal populations, and makes an adjustment for a limited purpose entity that serves migrant and seasonal farmworkers. The State also uses a minimum funding variable in the distribution formula that allows entities with smaller populations to receive at least $150,000. (e) Supporting asset-building programs for low-income individuals. (f) Supporting innovative programs and activities conducted by eligible entities or other neighborhood-based organizations to eliminate poverty, promote self-sufficiency, and promote community revitalization; and (h) supporting other activities, consistent with the purposes of the CSBG Act. (g) Omitted as CSBG is not used to support charity tax credit programs.

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 apply 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] Poverty and rural: current U.S. Decennial Census data available and updated annually using the ACS 5-year Survey. Employment statistics obtained from current Local Area Unemployment Survey (LAUS).
- Eligible entity community needs assessments
- Eligible entity plans
- Other information from eligible entities (e.g., State required reports) [describe]

Program narratives, public hearing comments and solicited feedback from eligible entities.

3.3b. Consultation with [Check all that apply 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]
- National organizations [describe] National Association of Community Action Providers (NASCSP)
- Federal Office of Community Services
- Other [describe] Third party consultant, NASCSP, hired to assist and evaluate implementation of CSBG Organizational Standards.

3.4. Eligible Entity Involvement

3.4a. Describe the specific steps the State took in developing the State Plan to involve the eligible entities.

(Note: This information is associated with State Accountability Measures 1Sa(ii) and may pre-populate the State’s annual report form)
See Attachment #2, CSBG State Plan Change Matrix FFY 2018. For this amendment: in response to input from and in coordination with, the Network, DAAS/CAPS will utilize SFY 2018 to further develop statewide goals for Community Action, that discussion will include enhanced communication and technical assistance initiatives; broader area assessment strategies, robust data collection, sharing and analysis, and coordination among statewide agencies and programs and evaluation of state processes and DAAS/CAPS will rewrite this planning section for the FFYs 2019-2020 CSBG State Plan. A draft amendment for Network comment was distributed in February 2017, for comment. Following meetings and discussion, DAAS/CAPS published the draft amendment for public inspection to its website in May 2017, and conducted one public hearing in June [ ], 2017. DAAS/CAPS also conducted a legislative hearing in August, 2017.

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.

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

DAAS/CAPS distributed a matrix of proposed changes and updates for the FFY 2018 amendment to the Network in November 2016 and solicited input. In SFY 2016 and 2017, DAAS/CAPS engaged a third party consultant and facilitated a workgroup with the Arizona Community Action Agency (ACAA) and the Network to implement a new funding formula for CSBG, and other DAAS/CAPS administered programs. As a result, the funding formula was revised based using factors agreed upon by the Network. DAAS/CAPS began discussions with the network earlier in the grant cycle, and offered additional time for input and inspection. Section 3.5 below was revised to reflect guidance from OCS and NASCSP regarding expectations for growth in the Eligible Entity Overall Satisfaction score.

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

3.5. Eligible Entity Overall Satisfaction:

Provide the State’s target for eligible entity Overall Satisfaction during the performance period: 67

(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.

The FFYs 2017-2018 CSBG State Plan Amendment was made available for public inspection and comment via publication and the public hearing process in 2017. Paper copies of the State Plan are available upon request. The draft State Plan was posted on the DES website in June, 2017. Oral and written testimony were solicited and accepted via the DES website and at public hearings from June 5 through July 7, 2017.

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 Section 676(a)(2)(B) of the CSBG Act.

FFYs 2017-2018 - DAAS/CAPS conducts multiple public hearings throughout the State in conjunction with the development year of the biennial State Plan. DAAS/CAPS also conducts a single public hearing in Phoenix in the intervening years, to solicit public comment regarding amendments to the current Plan. DAAS/CAPS will post a public notice, via its website, of the hearing schedule at least 30 days prior to any public hearing(s). The Department conducted several public hearings in 2016 to ensure public inspection, facilitate review, and solicit comments regarding the FFY 2017-2018 CSBG State Plan, and to provide opportunities for the public in various parts of the State to offer comments without the necessity of traveling to Phoenix. The first public hearing was held in Phoenix on July 5, 2016; the second in Tucson (southern Arizona) on July 6, 2016; and the third in Flagstaff (northern Arizona) on July 7, 2016. In the intervening plan year, 2017, DAAS/CAPS conducted one public hearing in Phoenix in June, to ensure public inspection and review of amendments to the FFYs 2017-2018 CSBG State Plan.

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 under Item 4.4.).

<table>
<thead>
<tr>
<th>Date</th>
<th>Location</th>
<th>Type of Hearing</th>
</tr>
</thead>
<tbody>
<tr>
<td>07/05/2016</td>
<td>Arizona State House of Representatives Chamber, State Capitol, 1700 West Washington Street, Phoenix, AZ 85007</td>
<td>Public</td>
</tr>
<tr>
<td>07/06/2016</td>
<td>2797 E Ajo Way, Tucson, AZ 85713</td>
<td>Public</td>
</tr>
<tr>
<td>07/07/2016</td>
<td>2625 N. King St., Flagstaff, AZ 86004</td>
<td>Public</td>
</tr>
<tr>
<td>06/30/2017</td>
<td>[Date tentative] - State Capitol, 1700 West Washington Street, Phoenix, AZ 85007</td>
<td>Public</td>
</tr>
<tr>
<td>08/02/2017</td>
<td>[Date tentative] - State Capitol, 1700 West Washington Street, Phoenix, AZ 85007</td>
<td>Legislative</td>
</tr>
</tbody>
</table>

4.4. Attach supporting documentation or a hyperlink for the public and legislative hearings.

The last legislative hearing was held August 2, 2017. The next legislative hearing is to be held in July or August of 2020. No testimony was presented in the public hearing in Phoenix, Arizona on July 5, 2017. See attached Public Hearing documents, and link to the Legislative Hearing. [Note Attachments - 2017 public and legislative hearing documents will be attached to final plan submittal]
### 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 90 percent funds from the State or tribes/tribal organizations that receive direct funding from OCS under Section 677 of the CSBG Act.*

Types of Entities include Community Action Agency, Limited Purpose Agency, Local Government Agency, Migrant or Seasonal Farmworker Organization, Tribe or Tribal Organization, and Other.

<table>
<thead>
<tr>
<th>#</th>
<th>CSBG Eligible Entity</th>
<th>Public or Nonprofit</th>
<th>Type of Agency (choose all that apply)</th>
<th>Geographical Area Served by county (Provide all counties)</th>
<th>Brief Description of &quot;Other&quot;</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>City of Glendale Human Services Department</td>
<td>Public</td>
<td>Local Government Agency</td>
<td>City of Glendale (Maricopa County)</td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>City of Phoenix Human Services Department</td>
<td>Public</td>
<td>Local Government Agency</td>
<td>City of Phoenix (Maricopa County)</td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>Coconino County Community Services Department</td>
<td>Public</td>
<td>Local Government Agency</td>
<td>Coconino County</td>
<td></td>
</tr>
<tr>
<td>4</td>
<td>Community Action Human Resources Agency (CAHRA)</td>
<td>Nonprofit</td>
<td>Community Action Agency (CAA)</td>
<td>Pinal County</td>
<td></td>
</tr>
<tr>
<td>5</td>
<td>Gila County Community Action Agency</td>
<td>Public</td>
<td>Local Government Agency</td>
<td>Gila County</td>
<td></td>
</tr>
<tr>
<td>6</td>
<td>Maricopa County Human Services Department</td>
<td>Public</td>
<td>Local Government Agency</td>
<td>Balance of Maricopa County</td>
<td></td>
</tr>
<tr>
<td>7</td>
<td>Mesa Community Action Network</td>
<td>Nonprofit</td>
<td>Community Action Agency (CAA)</td>
<td>City of Mesa (Maricopa County)</td>
<td></td>
</tr>
<tr>
<td>8</td>
<td>Northern Arizona Council of Governments (NACOG)</td>
<td>Public</td>
<td>Other (describe in column 5)</td>
<td>Yavapai, Navajo and Apache Counties</td>
<td>Quasi-governmental agency</td>
</tr>
<tr>
<td>9</td>
<td>Pima County Community Action Agency</td>
<td>Public</td>
<td>Local Government Agency</td>
<td>Pima County</td>
<td></td>
</tr>
<tr>
<td>10</td>
<td>Southeastern Arizona Community Action Program (SEACAP)</td>
<td>Nonprofit</td>
<td>Community Action Agency (CAA)</td>
<td>Greenlee, Graham, Cochise, and Santa Cruz Counties</td>
<td></td>
</tr>
<tr>
<td>11</td>
<td>Western Arizona Council of Governments</td>
<td>Public</td>
<td>Other (describe in column 5)</td>
<td>Mohave, Yuma and La Paz Counties</td>
<td>Quasi-governmental agency</td>
</tr>
<tr>
<td>12</td>
<td>Portable, Practical, Educational Preparation, Inc.*</td>
<td>Nonprofit</td>
<td>Migrant or Seasonal Farmworker Organization</td>
<td>Statewide</td>
<td>* With limited purpose</td>
</tr>
</tbody>
</table>

#### 5.2 Total number of CSBG eligible entities 12

#### 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? ☐ Yes ☐ No

If yes, please briefly describe the changes.
## 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
- attach the complete list of alternative organizational standards,
- describe the reasons for using alternative standards, and
- 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)

<table>
<thead>
<tr>
<th>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?</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐ Yes</td>
</tr>
</tbody>
</table>

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.

### 6.3 How will 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 apply and narrative where applicable)

- Regulation
- Policy
- Contracts with eligible entities
- Other, describe:

### 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

6.4a. Describe the assessment process.

Eligible entities will be assessed for compliance annually via desk review, or at a biennial monitoring visit. DAAS/CAPS utilizes an agreed upon tool modified from a sample document published by the Community Action Partnership to assess eligible entities. Eligible entities will be assessed annually via desk review or at a scheduled monitoring visit. In response to input from the Network during Plan development, a detailed policy clarification was written to further define this process (6.4a.). That document is attached. It is anticipated this policy will undergo further review and enhancement following assessment by a third party consultant in SFY 2017, and in coordination with the Network in SFY 2018.

### 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 which eligible entities the State will exempt from meeting organizational standards, and provide a description and a justification for each exemption.

Portable Practical Education Preparation \( \text{Standard 8.5:} \) Agency receives approximately $100,000 in CSBG funding per SFY to support programs funded by over $2,000,000 million in federal, local, and private funds. This agency has an annual budget of nearly $24,000,000. The agency Tripartite Board operates under the authority of a larger governing board and only has authority over CSBG and other leveraged funds under its Community Action program. CSBG funds are not used to pay for the services of the agency's accounting firm and the Board does not have the authority to approve the selection of an agency-wide auditor.

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? (Provide as a percentage) 0%

Note: This information is associated with State Accountability Measures 6Sa and may prepopulate the State's annual report form.
Section 7: State Use of Funds

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
Administration for Children and Families
Community Services Block Grant (CSBG)

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.

Formula with Variables

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.

<table>
<thead>
<tr>
<th>Planned CSBG 90 Percent Funds</th>
</tr>
</thead>
<tbody>
<tr>
<td>CSBG Eligible Entity</td>
</tr>
<tr>
<td>1 City of Glendale Human Services Department</td>
</tr>
<tr>
<td>2 City of Phoenix Human Services Department</td>
</tr>
<tr>
<td>3 Coconino County Community Services Department</td>
</tr>
<tr>
<td>4 Community Action Human Resources Agency (CAHRA)</td>
</tr>
<tr>
<td>5 Gila County Community Action Agency</td>
</tr>
<tr>
<td>6 Maricopa County Human Services Department</td>
</tr>
<tr>
<td>7 Mesa Community Action Network</td>
</tr>
<tr>
<td>8 Northern Arizona Council of Governments (NACOG)</td>
</tr>
<tr>
<td>9 Pima County Community Action Agency</td>
</tr>
<tr>
<td>10 Southeastern Arizona Community Action Program (SEACAP)</td>
</tr>
<tr>
<td>11 Western Arizona Council of Governments</td>
</tr>
<tr>
<td>12 Portable, Practical, Educational Preparation, Inc.*</td>
</tr>
<tr>
<td>Total</td>
</tr>
</tbody>
</table>

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).

The State operates the Community Action Program on the State Fiscal Year (SFY), July 1st through June 30th. The State enters into five-year budget-based/cost reimbursement contracts with eligible entities. Upon notification from OCS of annual allocations allotment to states from OCS, DAAS/CAPS communicates estimated annual allocations to eligible entities for the upcoming SFY to eligible entities in February or the month of March or April prior to the beginning of the upcoming SFY. DAAS/CAPS calls these communications ALERTS. Following any subsequent federal allocation change, OCS Notices of Award, etc., dollars are announced each quarter as they occur. The award of carryover from the previous year is also announced in August of the current fiscal year. If contract dollar amounts are changed, DAAS/CAPS amends the contract to reflect funding changes. FOR THIS AMENDMENT: This change of data source had a significant impact on the distribution of funding for CSBG and other federal funds. DAAS/CAPS held the eligible entities harmless from these distribution changes while a solution could be agreed upon. Responding to input from the Network, DAAS/CAPS, in consultation with a third party consultant, conducted research and negotiations with the Network in SFY 2017 to redesign the funding formula to ensure the fairest possible distribution of funds. Funding factors agreed upon by the Network and DAAS/CAPS will be implemented for SFY 2018 for the 90 percent of CSBG funds distributed to the eligible entities. See the attached document for the new funding formula. Federal allocation exceeded forecasted amount. Therefore, the hold harmless provision was not invoked for SFY 2018.

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.
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.

Note: This information is associated with State Accountability Measure 25b and may prepopulate the State's annual report form.

The State CSBG Office is currently participating in Government Transformation with a focus on implementing lean initiatives to dramatically shorten the time for developing Requests for Applications (RFAs). Once implemented, a shorter timeframe will benefit eligible entities by communicating contract changes sooner and reduce State administrative costs. In SFY 2016, DAAS/CAPS and the Network initiated a workgroup project to evaluate the funding distribution formula factors. In SFY 2017, DAAS/CAPS engaged a consultant to conduct research and report to the group best practices utilized by other states, and additional data sources that may be of use in an updated formula. DAAS/CAPS will provide an update to the funding formula discussion in the amendment for FFY 2018.

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 □ $ □ %

7.7. How many State staff positions will be funded in whole or in part with CSBG funds under this State Plan? □

7.8. How many State Full Time Equivalents (FTEs) will be funded with CSBG funds under this State Plan? □

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.

For each allowable use of remainder funds in the table below (rows a through h), enter the State's planned level of funding, if any, either in dollars or percentage, and provide a brief description. Activities funded under row a, training and technical assistance, do not require a description, as that is provided under section 8 of this State plan. Activities funded under rows b and c, are described under section 9, State Linkages and Communication, but a State may enter additional information in this table as well. The State must describe “innovative programs/activities by eligible entities or other neighborhood groups,” under row f, even if the State does not allocate discretionary funds to this activity. This activity is required by section 676(b)(2) of the CSBG Act, assurance 14.2 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 35a and may pre-populate the State's annual report form.

<table>
<thead>
<tr>
<th>Remainder/Discretionary Fund Uses</th>
<th>Year One Planned $</th>
<th>Year One Planned %</th>
<th>Year Two Planned $</th>
<th>Year Two Planned %</th>
<th>Brief description of services/activities</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Training/technical assistance to eligible entities</td>
<td>$100,000.00</td>
<td>0.00%</td>
<td>$100,000.00</td>
<td>0.00%</td>
<td>Training and Technical Assistance. These planned services/activities will be further described in State Plan item 8.1. This text should appear in the box (a) above, but no test field exists.</td>
</tr>
<tr>
<td>b. Coordination of State-operated programs and/or local programs</td>
<td>$0.00</td>
<td>0.00%</td>
<td>$0.00</td>
<td>0.00%</td>
<td>Coordination Activities. These planned services/activities will be described in State Plan section 9, State Linkages and Communication.</td>
</tr>
<tr>
<td>c. Statewide coordination and communication among eligible entities</td>
<td>$55,000.00</td>
<td>0.00%</td>
<td>$55,000.00</td>
<td>0.00%</td>
<td></td>
</tr>
<tr>
<td>d. Analysis of distribution of CSBG funds to determine if targeting greatest need</td>
<td>$0.00</td>
<td>0.00%</td>
<td>$0.00</td>
<td>0.00%</td>
<td></td>
</tr>
<tr>
<td>e. Asset-building programs</td>
<td>$0.00</td>
<td>0.00%</td>
<td>$0.00</td>
<td>0.00%</td>
<td></td>
</tr>
<tr>
<td>f. Innovative programs/activities by eligible entities or other neighborhood groups</td>
<td>$88,820.00</td>
<td>0.00%</td>
<td>$105,560.00</td>
<td>0.00%</td>
<td>These planned services/activities will be described in State Plan section 9, State Linkages and Communication. See Attachment 3, Allocations 2018</td>
</tr>
<tr>
<td>g. State charity tax credits</td>
<td>$0.00</td>
<td>0.00%</td>
<td>$0.00</td>
<td>0.00%</td>
<td></td>
</tr>
<tr>
<td>h. Other activities, specify in column 6</td>
<td>$30,000.00</td>
<td>0.00%</td>
<td>$30,000.00</td>
<td>0.00%</td>
<td>Emergencies and Disasters</td>
</tr>
<tr>
<td>Total</td>
<td>$273,820.00</td>
<td>0.00%</td>
<td>$290,560.00</td>
<td>0.00%</td>
<td></td>
</tr>
</tbody>
</table>

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 (if checked, include the expected number of CSBG eligible entities to receive funds) | 3 |
| 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.

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.

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

DAAS/CAPS will work with the Community Action Network to evaluate discretionary funding priorities in SFYs 2017 and 2018 and to develop a response for the FFY 2018 Amendment. FOR THIS AMENDMENT: DAAS/CAPS and the Network will address discretionary funding priorities in SFY 2018 for SFY 2019.
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), Remainder/Discretionary Funds.)

| Fiscal Year (Y) Quarter (Q) / Timeframe | Training, Technical Assistance, or Both | Topic | Brief Description of "Other"
|----------------------------------------|----------------------------------------|-------|-----------------
| FY1-Q1                                 | Technical Assistance                   | Organizational Standards - General | 
| FY1-Q1                                 | Technical Assistance                   | Monitoring | 
| FY1-Q2                                 | Technical Assistance                   | Standards for eligible entities with unmet standards on TAPs and QIPs | 
| FY1-Q2                                 | Training                               | ROMA | 
| FY1-Q2                                 | Technical Assistance                   | Monitoring | 
| FY1-Q3                                 | Training                               | ROMA | 
| FY2-Q3                                 | Technical Assistance                   | Other | ROMA Next Gen and Annual Report
| FY1-Q4                                 | Both                                   | Other | Self-Sufficiency Assessment
| FY2-Q2                                 | Training                               | Other | Program Delivery/Case Management
| FY2-Q1                                 | Training                               | ROMA | 
| FY2-Q1                                 | Training                               | Community Assessment | 
| FY2-Q2                                 | Both                                   | Other | Developing CAP Plans
| FY2-Q2                                 | Technical Assistance                   | Strategic Planning | 
| FY2-Q3                                 | Both                                   | ROMA | 
| FY2-Q3                                 | Both                                   | Governance/Tripartite Boards | 
| FY2-Q4                                 | Both                                   | ROMA | 
| FY2-Q4                                 | Technical Assistance                   | Other | Evaluation of Customer Satisfaction

8.1a. The planned budget for the training and technical assistance plan (as indicated in the Remainder/Discretionary Funds table in item 7.9) $564,380

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

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 that could be used if appropriate? ☑ Yes ☐ No

Note: This information is associated with State Accountability Measure 6.5b. 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).

SFYs 2016 and 2017 represent the State Assessment period. DAAS/CAPS has committed to the Network that it will not make formal findings during this assessment period. DAAS/CAPS will provide for training and technical assistance as needed to individual eligible entities, and to the Network at large, during this period, to facilitate agencies implementing and attaining compliance. DAAS will track unmet standards, needed documentation, time-bound objectives toward compliance via the DAAS Contracts Report of Findings (ROF) document. DAAS/CAPS will use this document to provide a summary of the State assessment. Standards that are unmet, or met but needing documentation, or currently implementing, will be listed as Recommendations, and summarized with requested actions and due dates. A QIP will be used in the instance that an unmet standard coincides with an existing statutory or contract requirement – DAAS/CAPS will either provide training and technical assistance with its own forces or through the Arizona Community Action Association which is provided for by the Arizona Community Action Association in consultation with the Network, to develop a training and technical assistance (TTA) strategy that will outline the various TTA activities to be conducted including, but not limited to, the following: Tripartite boards, such as new member orientation and low-income representative recruitment; ROMA training for agency staff and board members with respect to goal setting and evaluation of outcomes; and the basics of preparing the annual CSBG Information System Survey and the new CSBG Annual Report as the new system and technical assistance becomes available; training on ROMA Next Generation as it becomes available. The State will investigate options in conjunction with the Network, to develop further training and technical assistance priorities for implementation in SFY 2018. This schedule will be adjusted based on the availability of agency staff, boards, and trainers. FOR THIS AMENDMENT: DAAS/CAPS will summarize trends from the monitoring visits and assessments; and identify significant deficiencies common in the Network and provide TTA during visits or calls on documentation, especially regarding board action and board engagement; what documentation the State requires CAAs to have prepared for monitoring visits.

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 applies and narrative where applicable)

☐ CSBG eligible entities (if checked, provide the expected number of CSBG eligible entities to receive funds)
<table>
<thead>
<tr>
<th>Other community-based organizations</th>
<th>☐</th>
</tr>
</thead>
<tbody>
<tr>
<td>State Community Action association</td>
<td>☑</td>
</tr>
<tr>
<td>Regional CSBG technical assistance provider(s)</td>
<td>☐</td>
</tr>
<tr>
<td>National technical assistance provider(s)</td>
<td>☑</td>
</tr>
<tr>
<td>Individual consultant(s)</td>
<td>☑</td>
</tr>
<tr>
<td>Tribes and Tribal Organizations</td>
<td>☐</td>
</tr>
<tr>
<td>Other</td>
<td>☐</td>
</tr>
</tbody>
</table>

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

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.

The State will investigate options in conjunction with the Network, to develop further training and technical assistance priorities for implementation in SFY 2018. This schedule will be adjusted based on the availability of agency staff, boards and trainers. The FFY 2018 amendment will reflect any changes. FOR THIS AMENDMENT: DAAS/CAPS is continuing its development of T/TA in coordination with the state association, Arizona Community Action Association (ACAA), which is participating in the Regional Performance and Innovation Consortia (RPIC) T/TA Plan development project. Development of new T/TA is ongoing, and the T/TA Plan should be finalized by early FFY 2018.
Section 9: State Linkages and Communication

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 and narrative where applicable]

- 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 and eligible entities plan to create or maintain to ensure increased access to CSBG services to low-income people and communities and avoid duplication of services, as described under Section 675C(b)(B) and as required by assurance under Sections 676(b)(5) of the CSBG Act. Attach additional information as needed.

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

Linkage programs may include family/individual counseling, transportation, programs for persons with disabilities and seniors, neighborhood activities, food and nutrition, information and referral, local needs assessments, community outreach summer recreation, and other miscellaneous projects involving formal and informal partnerships and organizational relationships in the community. Eligible entities are required to provide an annual/biennial Community Action Program Plan (CAP Plan) that includes a description of planned activities that address the noted assurance. The State CSBG Office has initiated conversations with the State WIOA Office, which is housed in a separate division of DES, regarding enhancing coordination of workforce related activities at the State level. The newly implemented DES Office of Community Engagement is also conducting information sessions and coordination among agency divisions and private community organizations such as Valley of the Sun United Way to promote statewide communication and to develop linkages between and among the various State agency divisions and charitable organizations, including faith-based organizations in the community. The State CSBG program staff actively participate in this initiative. DAAS/CAPS will continue its conversations with the State Offices of WIOA and Child Support Services in SFY 2018 to strengthen partnerships and collaborations with the CAAs. DAAS/CAPS will investigate opportunities to coordinate and/or exchange information with the State offices of Head Start (Education Department), Public Health, and Child Welfare. FOR THIS AMENDMENT – DAAS/CAPS initiated linkages with several eligible entities and the State child welfare offices in FFY 2017. This work is ongoing. [Click paper clip to attach file]

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.]

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

Eligible entities are required to submit to DAAS/CAPS a Community Action Program Plan (CAP Plan) that must include a description of how they will establish and/or maintain linkages per Section 676(b)(5). Eligible entities develop linkages to fill identified gaps in services, through the provision of information, referrals, case management, and follow-up consultations. Some eligible entities develop linkages with local private organizations, such as financial institutions, to develop individual development account programs. Others contract with local non-profit agencies to provide specific services in their communities not offered by the eligible entity, such as food banks and job training programs. Some of these relationships are informal, others are subcontracted, and still others operate under Memorandums of Understanding (MOUs). See Attachment 6, Scope of Work and Attachments 14.1a and 14.1b, Section 14 Narrative Responses - CSBG Programmatic Assurances and Information Narrative. [Click paper clip to attach file]

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.

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

Eligible entities are required by contract to establish linkages to fill gaps in service per Section 676(b)(3)(B). DAAS/CAPS requires eligible entities provide a description in their annual/biennial CAP Plans and in their five-year contract renewal RFA responses, how they will fulfill the noted assurance. See Attachment 6, Scope of Work 2016-2020.

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.

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.

Eligible entities are required by DAAS/CAPS to submit an annual/biennial CAP Plan in which a description of how WIOA workforce activities are conducted is included. DAAS/CAPS initiated coordination with the State WIOA office in SFY 2015. These efforts will continue in SFY 2017. Some agencies have the WIOA offices on their own premises, while others make referrals to the nearest WIOA office. DAAS/CAPS interviews eligible entity staff during monitoring site visits regarding the details of WIOA activities. Updates to this initiative will be included in the two-year Plan for FFYs 2019 and 2020.

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.

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

DAAS/CAPS CSBG Program coordinates with the Low Income Home Energy Assistance Program (LIHEAP) and the Temporary Assistance to Needy Families (TANF)-funded State Short-Term Crisis Services (STCS) program via the Community Action Programs and Services contracts with eligible entities. CAAs utilize CSBG funds to manage and deliver energy assistance programs, including emergency energy crisis services. Eligible entities are required in their annual/biennial CAP Plans to provide a description of how they will provide energy crisis services.

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.

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

This assurance is required by the DAAS/CAPS Community Action Program Services contract. Eligible entities are required to describe in their annual/biennial CAP Plans and in their five-year RFA response how they will meet this assurance. State CSBG Program staff inquire at monitoring site visits regarding community coordination activities. Agencies document these efforts in annual narratives and on their annual CSBG IS reports. [Click paper clip to attach file]

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.

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

DAAS/CAPS requires eligible entities to describe in detail in their annual/biennial CAP Plans and in their five-year RFA responses how they will fulfill this assurance. Eligible entities report on these efforts in their Annual CSBG IS Report.

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.

DAAS/CAPS conducts regular monthly meetings via teleconference and/or face-to-face meetings with the State Association and the eligible entities and the state association, and provides funding to the state association for coordination activities.

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 | Brief Description of "Other"
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>1 Alerts</td>
<td>Quarterly</td>
<td>Other</td>
<td>Website and email - Include contract, program, funding information and technical assistance</td>
<td></td>
</tr>
<tr>
<td>2 Face-to-Face Meetings</td>
<td>Quarterly</td>
<td>Meetings/Presentation</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3 Tele-Conferences</td>
<td>Other</td>
<td>Meetings/Presentation</td>
<td>Monthly except where a Face-to-Face Meeting is scheduled.</td>
<td></td>
</tr>
<tr>
<td>4 Public Hearings</td>
<td>Annually</td>
<td>Meetings/Presentation</td>
<td></td>
<td></td>
</tr>
<tr>
<td>5 Legislative Hearings</td>
<td>Other</td>
<td>Meetings/Presentation</td>
<td>Every 3 years</td>
<td></td>
</tr>
<tr>
<td>6 General information regarding Community Action Programs and specific information regarding LIHEAP and TANF funded crisis services</td>
<td>Daily</td>
<td>Website</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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.

*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.*

AMENDED: DAAS/CAPS has initiated discussions with the Network in 2016 on State Accountability Measures. A more detailed narrative for this item is being developed in coordination with the Network for the FFY 2019 CSBG State Plan. Topics under consideration for DAAS/CAPS to provide regular communications for are: Annual Report (CSBG IS), written feedback, and State community engagement activities.

<table>
<thead>
<tr>
<th>9.11. Performance Management Adjustment:</th>
</tr>
</thead>
<tbody>
<tr>
<td>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.</td>
</tr>
</tbody>
</table>

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

AMENDED -- A written Communications Plan is being developed in coordination with the Network. A narrative response to this item will be provided for the FFY 2019 CSBG State Plan. FOR THIS AMENDMENT -- DAAS/CAPS will address a written communication plan in coordination with the Network in SFY 2018 and 2019, as the State and the Network are at work on the priorities of implementing ROMA next generation and the CSBG Annual report, as well as improving a joint Training and Technical Assistance Plan.
# Section 10: Monitoring, Corrective Action, and Fiscal Controls

## Monitoring of Eligible Entities

*(Section 678B(a) of the 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.

<table>
<thead>
<tr>
<th>CSBG Eligible Entity</th>
<th>Review Type</th>
<th>Target Date</th>
<th>Date of Last Full Onsite Review (if applicable)</th>
<th>Brief Description of &quot;Other&quot;</th>
</tr>
</thead>
<tbody>
<tr>
<td>City of Glendale Human Services Department</td>
<td>Full onsite</td>
<td>01/26/2016</td>
<td></td>
<td></td>
</tr>
<tr>
<td>City of Phoenix Human Services Department</td>
<td>Full onsite</td>
<td>12/14/2015</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Coconino County Community Services Department</td>
<td>Full onsite</td>
<td>FY1 Q1</td>
<td>11/14/2016</td>
<td></td>
</tr>
<tr>
<td>Community Action Human Resources Agency (CAHRA)</td>
<td>Full onsite</td>
<td>FY1 Q2</td>
<td>03/21/2017</td>
<td></td>
</tr>
<tr>
<td>Gila County Community Action Agency</td>
<td>Full onsite</td>
<td>11/17/2015</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Maricopa County Human Services Department</td>
<td>Full onsite</td>
<td>04/18/2016</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mesa Community Action Network</td>
<td>Full onsite</td>
<td>FY1 Q2</td>
<td>02/21/2017</td>
<td></td>
</tr>
<tr>
<td>Northern Arizona Council of Governments (NACOG)</td>
<td>Full onsite</td>
<td>05/23/2016</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Pima County Community Action Agency</td>
<td>Full onsite</td>
<td>09/29/2015</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Southeastern Arizona Community Action Program (SEACAP)</td>
<td>Full onsite</td>
<td>FY1 Q1</td>
<td>09/12/2016</td>
<td></td>
</tr>
<tr>
<td>Western Arizona Council of Governments</td>
<td>Full onsite</td>
<td>FY1 Q1</td>
<td>10/18/2016</td>
<td></td>
</tr>
<tr>
<td>Portable, Practical, Educational Preparation, Inc.*</td>
<td>Full onsite</td>
<td></td>
<td>08/25/2015</td>
<td></td>
</tr>
</tbody>
</table>

10.2. Monitoring Policies:
Provide a copy of State monitoring policies and procedures by attaching and/or providing a hyperlink.

See Attachment 8 subrecipient_monitoring.pdf. This policy covers the fiscal portion of DES subrecipient contracts. DAAS/CAPS does not have a written monitoring policy regarding programmatic elements of CSBG. DAAS/CAPS follows CSBG Statute, the contract scope of work, and the CSBG Organizational Standards when monitoring eligible entities. See Attachment 9

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?

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

30

10.4. Closing Findings:
Are State procedures for addressing eligible entity findings/deficiencies and documenting the 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 the closure of findings.

Currently, DAAS/CAPS solicits a Corrective Improvement Plan (CIP) and tracks time-bound objectives toward the remedy of findings and deficiencies. For serious deficiencies, the State Office of Procurement may issue a demand for assurance letter to the eligible entity for findings related to fiscal and administrative terms and conditions of the DAAS/CAPS contract. DAAS/CAPS follows up with the agency to assure the completion of the QIP, making follow up visits if necessary and providing technical assistance.
10.5. Quality Improvement Plans (QIPs):
How many eligible entities are currently on Quality Improvement Plans?

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

0

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

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

DAASSCAPS does not currently report eligible entities on QIPs to the Office of Community Services. The CSBG Organizational Standards are still in the State approved assessment and implementation period until SFY 2018. Eligible entities that do not meet all applicable Standards according to the State Assessment in SFY 2017, will be assisted as needed to become compliant beginning in SFY 2018. DAASSCAPS will implement TAPs in SFY 2018 for agencies needing assistance in their compliance efforts. DAASSCAPS does not currently have any eligible entities on QIPs. FOR THIS AMENDMENT – Development of a separate TAP tool has been suspended, and DAASSCAPS is using the agreed upon Organizational Standards Monitoring Tool and the existing Report of Findings document to track progress on recommendations and findings as well as progress in meeting the Organizational Standards. DAASSCAPS currently has one agency that is nearing completion of a QIP.

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 678(b)".

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

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

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.

Currently, DAASSCAPS has in place a moratorium on the designation of new eligible entities and the division of service areas by the State or the Network. A new entity designation would only occur as a result of an existing entity being de-designated, either voluntarily or for cause. In this instance, DAASSCAPS would initiate a public solicitation process in coordination with the State Office of Procurement within the unserved area. A public hearing is held in the unserved area to inform the community of the proposed designation. A public Request for Proposals is published via the State Office of Procurement website, www.ProcureAZ.gov. Local human service agencies may submit proposals for designation that contain all federal assurances under CSBG, and State assurances as required. An evaluation committee within DAASSCAPS determines the best qualified agency to be designated based upon qualifications stated and completeness of response to required assurances in the RFP response. The agency selected then completes a Request for Applications (RFA) response package identical to the RFA completed by existing eligible entities every five years as mentioned 10.10a below. This RFA includes federal CSBG assurances, agency fiscal information, and a detailed Scope of Work that includes allowable and required activities under the Community Action Program Services contract. During the annual State public hearing process, the statewide public at large will be informed of the designation of a new entity. DAASSCAPS will follow Public Law 105-285, Title II Community Services Block Grant Act, Section 676A.

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 eligible entities.

There is no State CSBG statute or regulation regarding the de-designation of eligible entities. DAASSCAPS will follow Public Law 105-285, Title II Community Services Block Grant Act, Section 676C, and the guidance provided in Information Memorandum No. 116, Corrective Action, Termination, or Reduction of Funding, in the event of the de-designation of an eligible entity.

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.

There is no State CSBG statute or regulation regarding the de-designation of eligible entities. The State CSBG Office does not have separate procedures for the re-designation of a new or an existing entity. DAASSCAPS will follow the procedure outlined in 10.8a. under Public Law 105-285, Title II Community Services Block Grant Act, Section 676A, in when re-designating a new eligible entity.

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).

The State has established fiscal controls, procedures, audits, and inspections, as required under Sections 678D(a)(1) and 678D(a)(2) of the Act. Arizona assures that fiscal control and fund accounting procedures established shall be sufficient to assure the proper disbursal of, and accounting for, federal funds paid to the State under this subtitle, including procedures for monitoring the assistance provided under this subtitle. Arizona assures the eligible entities and any other recipients of funds under this subtitle shall comply with the Office of Management and Budget cost and accounting principles. These assurances will be implemented by the State and/or through contract agreements with service providers. Each provider agreement will include requirements that the provider adhere to these areas as applicable to them.

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 Â§75.521. If these procedures are described in the State monitoring protocols attached under item 10.2, indicate the page number. CLICK HERE FOR LINK TO 45 CFR Â§75.521

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

At least annually, each state, local government, and American Indian Tribe or tribal organization that receives $100,000 or more (during the fiscal year) in all types of federal financial assistance must conduct an audit in accordance with the Single Audit Act, Public Law 98-502, [31 U.S.C 75 and OMB Circular A-128, 678D(a)(1) and 678D(a)(2)]

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

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 the State is not making any adjustments, provide further detail.

**Note:** This item is associated with [State Accountability Measure 4Sb](#) and may pre-populate the State’s annual report form.

| DAAS/CAPS does not have plans to revise its monitoring processes for SFY 2017, except for the adoption of a tool for assessing compliance with the CSBG Organizational Standards that was developed in conjunction with the Network. Any adjustments following internal discussion and feedback from eligible entities will be described in the amendment for FFY 2018. Current monitoring includes the following for assessing the CAAs status in implementing the CSBG Organizational Standards. Beginning in SFY 2016 and continuing in SFY 2017, the State is conducting an informal assessment of each eligible entity using the same model. The informal assessment will be conducted in conjunction with the existing monitoring schedule. The intent of this assessment is to identify training and technical assistance needs. Agencies in need of technical assistance may request State assessment and technical assistance earlier than their scheduled monitoring dates. The ADES will provide appropriate technical assistance to support eligible entities in achieving compliance with the organizational standards. FOR THIS AMENDMENT: The State will require full compliance with the organizational standards, as may be amended, by the end of SFY 2018, and will formally assess each eligible entity in accordance with its regular monitoring schedule beginning in SFY 2019. DAAS/CAPS will have its processes assessed by a third party consultant in late SFY 2017. Any adjustments will be reflected in the FFY 2019 CSBG State Plan. |
### Section 11: Eligible Entity Tripartite Board

**U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES**  
Administration for Children and Families  
Community Services Block Grant (CSBG)

#### 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 apply and narrative where applicable)

- [ ] Attend Board meetings
- [ ] Review copies of Board meeting minutes
- [ ] Keep a register of Board vacancies/composition
- [ ] Other

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 apply and narrative where applicable)

- [ ] Annually
- [ ] Semiannually
- [ ] Quarterly
- [ ] Monthly
- [ ] Other

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.

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

DAAS/CAPS will require each eligible entity in the State to establish procedures under which a low-income individual, community organization, 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 can petition for adequate representation.

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.

Private non-profit eligible entities are required to seat a tripartite board as set forth in Section 676B(b)(1) of the Act. Public entities may follow the provision stated above from 676B(b)(2) of the CSBG Act. The DAAS/CAPS contract Scope of Work Section 9.3.2 for public eligible entities reads as follows: Select members to serve on a Board in which one-third of the board members are persons chosen in accordance with democratic selection procedures adequate to assure that these members are representative of low-income individuals and families. Select representatives to fill balance of seats as set forth in governing documents. Currently, all public eligible entities voluntarily maintain tripartite boards per Section 676B(b)(1) of the Act.
Section 12: Individual and Community Eligibility Requirements

### 12.1. Required Income Eligibility:

What is the income eligibility threshold for services in the State?

[Check one item below.]

- X% of the HHS poverty line (fill in the threshold)
- 150%

#### 12.1a. Describe any State policy and/or procedures for income eligibility, such as treatment of income and family/household composition.

Income eligibility statewide varies by program. DAAS/CAPS follows program rules and State laws for State and federally funded programs conducted under Community Action Programs and Services contracts. For CSBG funded crisis services, eligible entities may set the income eligibility threshold at 150 percent of the federal poverty level for households with one or more members that are seniors aged 60 and over, or persons with disabilities. Households that do not meet this criteria are income eligible at or below 125 percent of poverty. This is in keeping with State laws regarding assistance provided under the TANF funded Short-Term Crisis Services (STCS), as set forth in Title 6, Chapter 13, Article 8 of the Arizona Administrative Code. This uniform eligibility threshold maintains fairness for households without children that have one or more vulnerable members, but do not qualify for crisis services under STCS/TANF. Using a uniform threshold and criteria avoids confusion, offers flexibility for case managed clients, reduces the administrative burden on eligible entities and will reduce technical assistance requests to DAAS/CAPS. The income eligibility limit for LIHEAP energy assistance programs administered with CSBG dollars is 60 percent of the State Median Income (SMI), adjusted for household size; or 150 percent of the Federal Poverty Guideline (FPG), whichever is greater for a given household. For SFY 2016 in Arizona, the FPG is greater for households with seven or more members. See Attachment 10 Income Thresholds.

### 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.

All eligible entities are required by contract and State law to verify program eligibility for CSBG supported services where required by program rules. Eligible entities target limited intake, general and short-term community based services such as: medical copay and prescription assistance, school supply, clothing and personal care products, and emergency food assistance, to existing case managed client households. Eligible entities coordinate extensively with local partners in delivering these community based services to the households in the greatest need. eligible entities may conduct or promote periodic mass events offering the services mentioned above by inviting program participants from their own and/or partners client lists who are known to have qualified for benefits. FOR THIS AMENDMENT: Income eligibility for CSBG funded direct services will follow the rules for the service being provided. If CSBG funds are used to provide a service under the Short Term Crisis Services, the income eligibility requirements for that program will apply. Conversely, for utility assistance, the income eligibility requirements would follow those for the State’s utility assistance program. Eligible entities may consider income eligibility for TANF funded or LIHEAP funded programs to indicate categorical income eligibility for any CSBG funded service.

### 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?

Some eligible entities offer community targeted services within their own or partner facilities that are located in low-income neighborhoods and/or senior centers. For example, some eligible entities coordinate with local education institutions and refer existing case managed households to community based education services. Still others offer community based services themselves at their own facilities and make them available to client households and applicants. These services include financial services, community gardens, career centers, education, and income management. DAAS/CAPS documents these activities during monitoring visits and encourages eligible entities to submit program narratives annually to highlight these activities.
<table>
<thead>
<tr>
<th>Section 13: Results Oriented Management and Accountability (ROMA) System</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES</strong></td>
</tr>
<tr>
<td>Administration for Children and Families</td>
</tr>
<tr>
<td>Community Services Block Grant (CSBG)</td>
</tr>
<tr>
<td><strong>SECTION 13</strong></td>
</tr>
<tr>
<td>Results Oriented Management and Accountability (ROMA) System</td>
</tr>
</tbody>
</table>

**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?

*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.**

Participation and utilization of ROMA in program planning is required by DAAS/CAPS contracts. DAAS/CAPS utilizes guidance from federal partners and OCS IMs 49, and 82. See Community Action Program Services Scope of work Work (SOW) sections 9.2.1 and 9.4.1. See Attachment 5 SOW 2016-2010.

**13.1b. If ROMA was not selected in Item 13.1, describe the system the State will use for performance measurement.**

[2500 characters]

**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?**

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

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

N/A

**13.3. How does the State support the eligible entities in using the ROMA system (or alternative performance measurement system)?**

*Note: The activities described under Item 13.3 may include activities... listed in “Section 8: State 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.*

DAAS/CAPS provides funds to the Arizona Community Action Association to provide ROMA training, and offers technical assistance to individual eligible entities upon request, responding to questions and conducting research on behalf of the eligible entities.

**13.4. Eligible Entity Use of Data:**
How is the State validating that the eligible entities are using data to improve service delivery?

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

DAAS/CAPS program staff interview eligible entity staff and Tripartite Board members, attend board meetings and review meeting minutes to ascertain the use of ROMA NPIs to evaluate programs by eligible entities. Agencies demonstrate the use of data through formal decisions made in Board meetings relative to data collected in the previous program year.

**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.**

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

Submission of a Community Action Plan by the eligible entities is required by contract at least once every two years, and during the contract renewal period, as part of the application package for eligible entities. FOR THIS AMENDMENT: DAAS/CAPS has begun work with ACAA to develop a new model CAP Plan that should be completed during SFY 2018 to SFY 2019.

**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.

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

Submission of a Community Needs Assessment is required by contract at least once every three years. This period may be extended for eligible entities with an active assessment project under way during the year the assessment document is due. An extension may also be granted by DAAS/CAPS for agencies coordinating community assessments with other programs such as Head Start. Agencies requesting extensions must demonstrate that they are engaged in an active assessment project and provide a written methodology and timeline for completion.
## Section 14: CSBG Programmatic Assurances and Information Narrative

### CSBG Programmatic Assurances and Information Narrative

(Section 676(b) of the CSBG Act)

<table>
<thead>
<tr>
<th>14.1 Use of Funds Supporting Local Activities</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>CSBG Services</strong></td>
</tr>
<tr>
<td><strong>14.1a. 676(b)(1)(A):</strong> Describe how the State will assure &quot;that funds made available through grant or allotment will be used -&quot;</td>
</tr>
<tr>
<td>(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 farm workers, and elderly low-income individuals and families, and a description of how such activities will enable the families and individuals--</td>
</tr>
<tr>
<td>(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);</td>
</tr>
<tr>
<td>(ii) to secure and retain meaningful employment;</td>
</tr>
<tr>
<td>(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;</td>
</tr>
<tr>
<td>(iv) to make better use of available income;</td>
</tr>
<tr>
<td>(v) to obtain and maintain adequate housing and a suitable living environment;</td>
</tr>
<tr>
<td>(vi) to obtain emergency assistance through loans, grants, or other means to meet immediate and urgent individual and family needs;</td>
</tr>
<tr>
<td>(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 -</td>
</tr>
<tr>
<td>(I) document best practices based on successful grassroots intervention in urban areas, to develop methodologies for widespread replication; and</td>
</tr>
<tr>
<td>(II) strengthen and improve relationships with local law enforcement agencies, which may include participation in activities such as neighborhood or community policing efforts;</td>
</tr>
</tbody>
</table>

DAAS/CAPS requires CSBG eligible entities to submit an annual Community Action Program Plan (CAP Plan). The CAP Plan includes a description of proposed activities as they relate to the assurances set forth in 14.1a (i)-(vii), "CSBG Services". DAAS/CAPS staff reviews the CAP Plan and ensures that the activities supported are eligible uses of CSBG funds. DAAS/CAPS requires each of the noted assurances to be addressed in the agency CAP Plan. For additional detail, see Attachment 4 FFY 2017 Program Narratives

### 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;

DAAS/CAPS requires CSBG eligible entities to submit an annual Community Action Program Plan (CAP Plan). The CAP Plan includes a description that outlines proposed activities. DAAS/CAPS staff reviews the CAP Plan and ensures that the activities supported are eligible uses of CSBG funds. DAAS/CAPS requires a referral to the DES Division of Child Support Enforcement Office for heads of households who are single/divorced custodial parents not currently receiving child support. In ongoing efforts to avoid duplication of services, DAAS/CAPS does not directly operate or support after school child care programs, as these are available through other programs in the communities served. Eligible entities are required by their contracts, to set forth in their written administrative and service methodologies, a description of how they will support these programs through coordination with community partners, federally funded programs, such as Head-Start, and referrals to local and private programs. For examples, see Attachment 14.1b - Needs of Youth.

### 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)

DAAS/CAPS requires CSBG eligible entities to submit an annual Community Action Program Plan (CAP Plan). The CAP Plan includes a description of its plans and ongoing efforts to coordinate programs in its service area. Staff reviews the CAP Plan and ensures that the activities supported are eligible uses of CSBG funds and coordination. At the State level, the State Human Services agency, DES, coordinates a variety of programs using State and federal resources including Supplemental Nutrition Assistance Program (SNAP), and Workforce Innovation and Opportunity Act (WIOA), Temporary Assistance for Needy Families (TANF) Medicaid, Department
of Housing and Urban Development (HUD), Department of Labor (DOL) programs. DAAS/CAPS includes in its Community Action Programs and Services contracts with eligible entities, the Low-Income Home Energy Assistance Program (LIHEAP), Short-Term Crisis Services (STCS/TANF), and other State and county funds. Current DES agency-wide outreach efforts conducted by the Office of Community Engagement are working to coordinate the various State service departments with other local private, and faith-based organizations including, Community Action Agencies. DAAS/CAPS staff participate in the activities of this office. DAAS/CAPS also supports the State Association, the Arizona Community Action Association (ACAA), in its efforts to coordinate with the Community Action Network as a whole, to develop and maintain relationships with other State and local agencies, federal programs, and information and referral systems.

State Use of Discretionary Funds

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

Note: The State describes this assurance under "State Use of Funds: Remainder/Discretionary," items 7.9 and 7.10

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..."

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;"

The Department requires CSBG eligible entities to submit an annual Community Action Program Plan (CAP Plan) and contract documents that include a description of the service delivery system, the county or 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 Plan also describes how the eligible entity coordinates funds with other organizations. The eleven CAAs in Arizona are contracted by DAAS/CAPS under their Community Action Programs and Services contract to provide services through the Low Income Home Energy Assistance Program (LIHEAP). DAAS/CAPS also contracts with the Arizona Department of Housing to provide Weatherization services in coordination with funding from the Department of Energy, which in turn subcontracts with nine eligible entities, and one additional sub-grantee, to offer Weatherization services. All eligible entities are required by contract to utilize CSBG funding in coordination with funding from Temporary Assistance for Needy Families (TANF), to deliver the State mandated emergency assistance program, Short Term Crisis Services (STCS). The State may award CSBG discretionary funds to support enhanced service methods, innovative special projects, and partnership initiatives.

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 followup consultations."

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

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

14.3c. 676(b)(3)(C) Describe how funds made available through grants made under 675C(a) will be coordinated with other public and private resources." Note: The State describes this assurance in the State Linkages and Communication section, item 9.7.

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 Section 675C(a)] to support innovative community and neighborhood-based initiatives related to the purposes of this subtitle, which may include fatherhood initiatives and other initiatives with the goal of strengthening families and encouraging parenting."

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

DAAS/CAPS requires CSBG eligible entities to submit an annual Community Action Program Plan (CAP Plan), in which the entities describe how CSBG funds will be used to meet the noted assurance.

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."

DAAS/CAPS requires CSBG eligible entities to submit an annual Community Action Program Plan (CAP Plan). As part of the CAP Plan, eligible entities must provide a description of how the 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, a food bank, or operate their own emergency food service in house, to provide food in these circumstances. Some eligible entities subcontract with local charities that provide emergency food as part of their suite of services. Some eligible entities also coordinate with the State Supplemental Nutrition Assistance Program (SNAP) to facilitate applications for State nutritional assistance. Under eligible entities' contracts with DAAS/CAPS, CSBG funds may be used to support emergency food program operations. If the cases of emergent need that cannot be met immediately through other programs, eligible entities may utilize CSBG funds to meet food emergencies by providing food cards to qualified low-income households. In the case of a local emergency or disaster in low-income neighborhoods, eligible entities may be authorized by DAAS/CAPS to utilize CSBG discretionary funds to provide temporary shelter and/or emergency food to affected residents.

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

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

Note: The State describes this assurance in the State Linkages and Communication section, items 9.1, 9.2, 9.3a, 9.4, 9.4a, and 9.4b.
### State Coordination/Linkages and Low-income Home Energy Assistance

<table>
<thead>
<tr>
<th>Section</th>
<th>Assurance Description</th>
<th>Note</th>
</tr>
</thead>
<tbody>
<tr>
<td>14.6. 676(b)(6)</td>
<td>Provide &quot;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.&quot;</td>
<td>The State describes this assurance in the State Linkages and Communication section, items 9.2 and 9.5.</td>
</tr>
<tr>
<td>14.7. 676(b)(7)</td>
<td>Provide &quot;an assurance that the State will permit and cooperate with Federal investigations undertaken in accordance with section 678D.&quot;</td>
<td>The State addresses this assurance in the Fiscal Controls and Monitoring section, item 10.13.</td>
</tr>
<tr>
<td>14.8. 676(b)(8)</td>
<td>Provide &quot;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).&quot;</td>
<td>The State addresses this assurance in the Fiscal Controls and Monitoring section, item 10.7.</td>
</tr>
<tr>
<td>14.9. 676(b)(9)</td>
<td>Describe how the State will assure &quot;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.&quot;</td>
<td>The State describes this assurance in the State Linkages and Communication section, item 9.6.</td>
</tr>
<tr>
<td>14.10. 676(b)(10)</td>
<td>Describe how &quot;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.&quot;</td>
<td>The State describes this assurance in the Eligible Entity Tripartite Board section, 11.3.</td>
</tr>
<tr>
<td>14.11. 676(b)(11)</td>
<td>Provide &quot;an assurance that the State will secure from each eligible entity in the 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.&quot;</td>
<td>The State describes this assurance in the ROMA section, items 13.5 and 13.6.</td>
</tr>
<tr>
<td>14.12. 676(b)(12)</td>
<td>Provide &quot;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.&quot;</td>
<td>The State describes this assurance in the ROMA section, items 13.1, 13.2, 13.3, and 13.4.</td>
</tr>
<tr>
<td>14.13. 676(b)(13)</td>
<td>Provide &quot;information describing how the State will carry out the assurances described in this section.&quot;</td>
<td>The State provides information for each of the assurances directly in section 14 or in corresponding items throughout the State Plan, which are included as hyperlinks in section 14.</td>
</tr>
</tbody>
</table>

By checking this box, the State CSBG authorized official is certifying the assurances set out above.
Section 15: Federal Certifications

CERTIFICATION REGARDING LOBBYING

Certification for Contracts, Grants, Loans, and Cooperative Agreements

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

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.

Statement for Loan Guarantees and Loan Insurance

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

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

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

15.1. Lobbying

After assurance select a check box:

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

CERTIFICATION REGARDING 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).
(B) 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)

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]

15.2. Drug-Free Workplace Requirements

After assurance select a check box:

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

CERTIFICATION REGARDING DEBARMENT, SUSPENSION AND OTHER RESPONSIBILITY
MATTERS

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

Instructions for Certification

1. By signing and submitting this proposal, the prospective primary participant is providing the
certification set out below.

2. The inability of a person to provide the certification required below will not necessarily result
in denial of participation in this covered transaction. The prospective participant shall submit an
explanation of why it cannot provide the certification set out below. The certification or explanation will
be considered in connection with the department or agency's determination whether to enter into this
transaction. However, failure of the prospective primary participant to furnish a certification or an
explanation shall disqualify such person from participation in this transaction.

3. The certification in this clause is a material representation of fact upon which reliance was
placed when the department or agency determined to enter into this transaction. If it is later determined
that the prospective primary participant knowingly rendered an erroneous certification, in addition to
other remedies available to the Federal Government, the department or agency may terminate this
transaction for cause or default.

4. The prospective primary participant shall provide immediate written notice to the department
or agency to which this proposal is submitted if at any time the prospective primary participant learns
that its certification was erroneous when submitted or has become erroneous by reason of changed
circumstances.

5. The terms covered transaction, debarred, suspended, ineligible, lower tier covered
transaction, participant, person, primary covered transaction, principal, proposal, and voluntarily
excluded, as used in this clause, have the meanings set out in the Definitions and Coverage sections of
the rules implementing Executive Order 12549. You may contact the department or agency to which
this proposal is being submitted for assistance in obtaining a copy of those regulations.

6. The prospective primary participant agrees by submitting this proposal that, should the
proposed covered transaction be entered into, it shall not knowingly enter into any lower tier covered
transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, debarred,
suspended, declared ineligible, or voluntarily excluded from participation in this covered transaction,
unless authorized by the department or agency entering into this transaction.

7. The prospective primary participant further agrees by submitting this proposal that it will
include the clause titled "Certification Regarding Debarment, Suspension, Ineligibility and Voluntary
Exclusive-Lower Tier Covered Transaction," provided by the department or agency entering into this
covered transaction, without modification, in all lower tier covered transactions and in all solicitations for
lower tier covered transactions

8. A participant in a covered transaction may rely upon a certification of a prospective
participant in a lower tier covered transaction that is not proposed for debarment under 48 CFR
part 9, subpart 9.4, debarred, suspended, ineligible, or voluntarily excluded from the covered
transaction, unless it knows that the certification is erroneous. A participant may decide the
method and frequency by which it determines the eligibility of its principals. Each participant
may, but is not required to, check the List of Parties Excluded from Federal Procurement and
Nonprocurement Programs.

9. Nothing contained in the foregoing shall be construed to require establishment of a
system of records in order to render in good faith the certification required by this clause. The
knowledge and information of a participant is not required to exceed that which is normally
possessed by a prudent person in the ordinary course of business dealings.

10. Except for transactions authorized under paragraph 6 of these instructions, if a
participant in a covered transaction knowingly enters into a lower tier covered transaction with a
person who is proposed for debarment under 48 CFR part 9, subpart 9.4, suspended, debarred,
ineligible, or voluntarily excluded from participation in this transaction, in addition to other
remedies available to the Federal Government, the department or agency may terminate this
transaction for cause or default.

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

(1) The prospective primary participant certifies to the best of its knowledge and belief, that it
and its principals:

(a) Are not presently debarred, suspended, proposed for debarment, declared ineligible, or
voluntarily excluded by any Federal department or agency;

(b) Have not within a three-year period preceding this proposal been convicted of or had a
civil judgment rendered against them for commission of fraud or a criminal offense in
connection with obtaining, attempting to obtain, or performing a public (Federal, State or local)
transaction or contract under a public transaction; violation of Federal or State antitrust statutes
or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records,
making false statements, or receiving stolen property;

(c) Are not presently indicted for or otherwise criminally or civilly charged by a governmental
entity (Federal, State or local) with commission of any of the offenses enumerated in paragraph
(1)(b) of this certification; and

(d) Have not within a three-year period preceding this application/proposal had one or more
public transactions (Federal, State or local) terminated for cause or default.

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

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

Instructions for Certification

1. By signing and submitting this proposal, the prospective lower tier participant is
providing the certification set out below

2. The certification in this clause is a material representation of fact upon which reliance
was placed when this transaction was entered into. If it is later determined that the prospective
lower tier participant knowingly rendered an erroneous certification, in addition to other

3. The prospective lower tier participant shall provide immediate written notice to the
person to which this proposal is submitted if at any time the prospective lower tier participant
learns that its certification was erroneous when submitted or had become erroneous by reason
of changed circumstances.

4. The terms covered transaction, debarred, suspended, ineligible, lower tier covered
transaction, participant, person, primary covered transaction, principal, proposal, and
voluntarily excluded, as used in this clause, have the meaning set out in the Definitions and
Coverage sections of rules implementing Executive Order 12549. You may contact the person to
which this proposal is submitted for assistance in obtaining a copy of those regulations.
5. The prospective lower tier participant agrees by submitting this proposal that, should the proposed covered transaction be entered into, it shall not knowingly enter into any lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, declared ineligible, or voluntarily excluded from participation in this covered transaction, unless authorized by the department or agency with which this transaction originated.

6. The prospective lower tier participant further agrees by submitting this proposal that it will include this clause titled "Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion-Lower Tier Covered Transaction," without modification, in all lower tier covered transactions and in all solicitations for lower tier covered transactions.

7. A participant in a covered transaction may rely upon a certification of a prospective participant in a lower tier covered transaction that it is not proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, ineligible, or voluntarily excluded from covered transactions, unless it knows that the certification is erroneous. A participant may decide the method and frequency by which it determines the eligibility of its principals. Each participant may, but is not required to, check the List of Parties Excluded from Federal Procurement and Nonprocurement Programs.

8. Nothing contained in the foregoing shall be construed to require establishment of a system of records in order to render in good faith the certification required by this clause. The knowledge and information of a participant is not required to exceed that which is normally possessed by a prudent person in the ordinary course of business dealings.

9. Except for transactions authorized under paragraph five of these instructions, if a participant in a covered transaction knowingly enters into a lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, suspended, debarred, ineligible, or voluntarily excluded from participation in this transaction, in addition to other remedies available to the Federal Government, the department or agency with which this transaction originated may pursue available remedies, including suspension and/or debarment.

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.

15.3. Debarment

After assurance select a check box:

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

CERTIFICATION REGARDING ENVIRONMENTAL TOBACCO SMOKE

Public Law 103-227, 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.

<table>
<thead>
<tr>
<th>15.4. Environmental Tobacco Smoke</th>
</tr>
</thead>
<tbody>
<tr>
<td>After assurance select a check box:</td>
</tr>
<tr>
<td>☑️ By checking this box, the State CSBG authorized official is providing the certification set out above.</td>
</tr>
</tbody>
</table>

THE PAPERWORK REDUCTION ACT OF 1995 (Pub. L. 104-13)
Public reporting burden for this collection of information is estimated to average 10 hours per response, including the time for reviewing instructions, gathering and maintaining the data needed, and reviewing the collection of information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.
August 17, 2015

Ms. Jeannie Chaffin  
Director, U.S. Department of Health and Human Services  
Administration for Children and Families  
Office of Community Services, Division of Energy Assistance  
Aerospace Building, 5th Floor West  
370 L’Enfant Promenade, S.W.  
Washington, DC 20447

Dear Ms. Chaffin,

I, Governor Douglas A. Ducey, delegate my authority to the Department of Economic Security Director to certify to the 16 assurances outlined in the Low Income Home Energy Assistance Act of 1981, as amended, and otherwise perform all necessary functions to properly administer the Low Income Home Energy Assistance Program and the Community Service Block Grant Program. The Director’s address and telephone number are:

Director  
Arizona Department of Economic Security  
P.O. Box 6123  
Site Code 010A  
Telephone: (602) 542-5757

If you have any questions, please the Office of the Assistant Director, Division of Aging and Adult Services, at (602) 542-4446.

Sincerely,

[Signature]

Douglas A. Ducey  
Governor  
State of Arizona
<table>
<thead>
<tr>
<th>Corresponding Section</th>
<th>New Model Plan</th>
<th>Proposed Plan Modifications – Detail and Remarks for upcoming FFY 2018 in bold text</th>
<th>CAP Network’s 2017 historical comments and space for FFY 2018 remarks going forward</th>
<th>DES Response/changes and tracking of workgroup discussion</th>
</tr>
</thead>
</table>
| Form SF-424M – CSB Model Plan Template form OMB 0970-0382 | • Proposed narrative or changes listed in this column, dated and annotated.  
• Agreed upon changes will be transferred to the final matrix document.  
• Historical narrative text (FFY 2017) is in small font.  
• Items requiring updating for FFY 2018 are marked and highlighted as follows: MUST UPDATE FOR FFY 2018 | • Comments provided in workgroup going forward will be listed here in bold.  
• Historical Comments are in small font.  
• New comments, remarks, suggestions and requested can be typed here in this column in the line associated with the appropriate section.  
• Additional lines may be inserted at the bottom of this form for items not appearing here, that the Network would like to discuss at future | The comments below in small font are from SFY 2017 and included for historical reference. Recent comments are highlighted and in bold. |
| General | FFY 2018: 11/7/16: All instances of the abbreviation “DAAS/CAPS”, indicating the State CSBG work unit, in the document will be changed to “State CSBG Office”. This change will be explained in a narrative in Section 1. DES will need to update its attached agency policy documents, as some of these may have changed during FFY 2016 and 2017. 2/2017: OCS instructions and comment boxes removed from draft to save space. | | |
| Section 1 | 11/7/16 – Changes in divisional structure will need to Stated here. 2/2017: Updated with administrative name changes FOR FFY 2018 | | |
| Section 2 – State Legislation and Regulation | 11/1/16 – This section will not change. 2/14/17: Confirmed. No changes | | |
| Section 3 – State Plan Development and Statewide Goals | 3.1 and 3.2– Narrative text derived in part from existing language from the previous Plan, Section V. A. 1. Paragraph (a); and also from language paraphrased from the DES webpage. Also under this section: 3.2, State Plan Goals, with language derived from the previous Plan Section V. C. Item 3.3a through 3.5 are new, and will likely be discussed at length with the Network. Revisions expected for the SFY 2018 amendment. | FFY 2018:  
The Network would like the State to develop goals for Community Action statewide / at the state level. This may need to be deferred to the new plan that will be drafted in 2018.  
This will be a topic for the 2019 Plan. Goals for Community Action should be drawn from needs assessment. Common areas of concern should be addressed by DAAS and the Network, as should local and State resources available, in order to develop statewide goals for Goals. The following verbiage added: For this amendment: DAAS/CAPS, in response to Network input, and in coordination with the Network, will utilize SFY 2018 to further develop statewide goals for Community Action. That discussion will include | |
<table>
<thead>
<tr>
<th>Section 3 – State Plan Development</th>
</tr>
</thead>
<tbody>
<tr>
<td>2/2017: 3.4.a. Text added: &quot;For this amendment: DAAS/CAPS, in response to Network input, and in coordination with the Network, will utilize SFY 2018 to further develop statewide goals for Community Action, that discussion will include enhanced communication and technical assistance initiatives; broader area assessment strategies, robust data collection, sharing and analysis, and coordination among statewide agencies and programs and evaluation of state processes and DAAS/CAPS will rewrite this planning section for the FFYs 2019-2020 CSBG State Plan.&quot;</td>
</tr>
<tr>
<td>2018</td>
</tr>
<tr>
<td>5/4/2017: Removed text from the workbook that was not included in the Official Plan. The text indicated at left has been moved to 3.4a.</td>
</tr>
</tbody>
</table>

| Note: 5/5/17. Text regarding the revised formula was added to 3.4b. |

<table>
<thead>
<tr>
<th>Section 3 – State Plan Development</th>
</tr>
</thead>
<tbody>
<tr>
<td>2/2017 The following added to 3.3b. &quot;Other&quot; checkbox checked to indicate consultation with a third party regarding the funding formula, and 3.4a was revised to add narrative to describe the process for revising the funding formula. 5/8/17 –Revised language in 3.3b &quot;Other&quot; to include the assistance of NASCSP to analyze our processes for Organizational Standards and the Annual Report.</td>
</tr>
<tr>
<td>2018</td>
</tr>
<tr>
<td>5/2/17: Text from 3.2 above has been moved to 3.4a for space and appropriateness. For this amendment: DAAS/CAPS, in response to Network input, and in coordination with the Network, will utilize SFY 2018 to further develop statewide goals for Community Action, that discussion will include enhanced communication and technical assistance initiatives; broader area assessment strategies, robust data collection, sharing and analysis, and coordination among statewide agencies and programs and evaluation of state processes and DAAS/CAPS will rewrite this planning section for the FFYs 2019-2020 CSBG State Plan.&quot;</td>
</tr>
</tbody>
</table>

Comment - 10/31/16: This section will need to be revised and strengthened for FFY 2018 in response to the Network feedback. Updated with programmatic changes for the division. Some narrative text from the DES website was removed.

enhanced communication and technical assistance initiatives; broader area assessment strategies, robust data collection, sharing and analysis; coordination among statewide agencies and programs, and evaluation and improvement of state processes. DAAS/CAPS will rewrite this planning section for the FFYs 2019-2020 CSBG State Plan. Programmatic changes include the addition and modification of programs administered by DAAS. Hunger Prevention and Independent Living program name change to Aging and Disability Services added.
<table>
<thead>
<tr>
<th>Section 3 – State Plan Development and Statewide Goals</th>
<th>DAAS/CAPS also conducted a legislative hearing in August, 2017.</th>
</tr>
</thead>
<tbody>
<tr>
<td>FFY 2017 - 3.5 Eligible Entity Overall Satisfaction: Provide the State’s target for eligible entity. Overall Satisfaction during the performance period: 10/31/16: This section will need to be revised and strengthened for FFY 2018. OCS has indicated in a recent training, that a goal of 10% improvement in ASCI scores is realistic. This goal should be adjusted to 67% from 75% for FFY 2018.</td>
<td>FFY 2017 - The Network supports the goal of a 75% overall satisfaction rate; up from 56% currently. The Network also requests the inclusion of the survey results (both the overall score and the score in each of the 9 survey categories) in this document as they are now available. In addition, if appropriate, the Network would like DES to comment on addressing the State Accountability Measure as it relates to survey scores. FFY 2018: FFY 2017 - DAAS/CAPS will develop narrative remarks for this State Accountability Measure for the FFY 2018 Amendment. There is no space for narrative remarks in Section 3.5 of the Model Plan. The Survey results are considered confidential and not public information, and will not be included with the OLDC submitted State Plan. However, for historical and Network coordination purposes, they are on record at the DAAS/CAPS office for review. DAAS/CAPS revised the 75% overall satisfaction goal to 67% following guidance from OCS suggesting states aim for a 10% improve in survey scores.</td>
</tr>
</tbody>
</table>

| Section 4 - CSBG Hearing Requirements | FFY 2017- In conjunction with the designated CAP Agencies and the Arizona Community Action Association, there is a need to better advertise the State Plan Hearings to stakeholders and community partners. FFY 2018: FFY 2017: Dates updated. Response 1. Hearings are advertised per State Public Information Office guidelines, on the agency web page. Eligible entities and the Arizona Community Action Association may also advertise the public hearings. DAAS/CAPS suggest further discussion regarding additional means to advertise public hearings in the areas where hearings are held as part of the ongoing communications plan development. 7/11/16 – in response to the Network comment regarding better advertising for public hearings: DAAS/CAPS now advertises the CSBG public hearings via social media in addition to the DES webpage. |

| Section 5 – CSBG Eligible Entities | 11/1/16 - This section will not change. |

| Section 6 - Organizational Standards for Eligible Entities | 6.3 – DAAS/CAPS will draft a written policy clarification document in SFY 2017 to clarify the timing at which all eligible entities will be expected to be in compliance with all The Network expressed concern with the timing of all eligible entities reaching compliance status (see detailed comment below in section 6.4 on the next line). Policy clarification document in process. 7/11/16: Added a check to the box for “Policy” regarding organizational standards assessment, |
**Organizational Standards, and when “hard monitoring” for full compliance will begin” FFY 2018:** We will revisit this policy if needed. Any significant revisions should be done for FFY 2019.

**2/2017 6.3 – Text added: “For this amendment: Through discussion with the Network in SFY 2017, DAAS/CAPS agreed that a written policy clarification will need to be developed a policy to facilitate implementation and assess ongoing compliance with the Standards going forward. This item will be amended for FFY 2018 to reflect enhancements. DAAS/CAPS engaged a third party consultant in SFY 2017 to evaluate the State Office policies, processes, and the assessments of eligible entities.**

**6.4 2/2017:** See policy draft Attachment 6.4

**FFY 2018:**

<table>
<thead>
<tr>
<th><strong>Policy</strong></th>
<th><strong>Clarification</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Section 6 - Organizational Standards for Eligible Entities</strong></td>
<td><strong>6.4 - Organizational Standards for Eligible Entities See attachment 6.4a Narrative updated for FFY 2017.</strong></td>
</tr>
<tr>
<td><strong>6.4a</strong></td>
<td><strong>Narrative updated for FFY 2017.</strong></td>
</tr>
<tr>
<td><strong>FFY 2018:</strong></td>
<td><strong>There is concern by the Network about the adoption of the Organizational Standards through contracts with eligible entities. The process that DES has laid out is that in FY16 half of the agencies will be monitored/assessed and the additional half will be monitored/assessed in FY 17. This monitoring/assessment will result in recommendations but no findings. Agencies will be expected to address deficiencies in order to come into full compliance in FY18. If this process is held to, there is significant concern about how DAAS can contractually require all agencies to be in compliance with the Organizational Standards. If for example, an agent is not monitored/assessed in FY17 and there is an Organizational Standard that they are not meeting and they plan to come into compliance by FY18 through training and technical assistance are they out of contract compliance? Clarity is needed on this issue and it is the recommendation of the Network that a policy is issued for FY17. It is requested that this policy comprehensively outline a uniform process that will be utilized to determine whether agencies are meeting the Organizational Standards. There is request for clarification on how the state of third party has or will validate the results of the self-assessments.</strong></td>
</tr>
</tbody>
</table>
|  | **FFY 2018:**
|  | **Regarding comments in the change matrix, the Network feels more clarity is needed. How will agencies that were monitored be notified of deficiencies? How and when will a plan with timeline be developed to address deficiencies? The DES response in the change matrix (third column) says** |
|  | **Policy clarification is being drafted and will be released in July 2016. Will remove language from OLDC document, and include instead in Attachment 6.4a. The revised text is too long for character limits in the Online Data Collection System (OLDC). DAAS/CAPS do not have plans to utilize third party assessment at this time. 7/11/16: Added a check to the box for “Other” regarding organizational standards assessment, to indicate the bi-annual desk review that will take place between onsite monitoring visits. Attachment 6.4 will constitute a draft policy clarification following discussion with the Network in late July, 2016. DAAS/CAPS will complete initial State assessments in SFY 2017. Eligible entities will be required to be in full compliance by SFY 2018, as stated in the FFYs 2017-2018 Plan. Beginning in SFY 2017, eligible entities will be assessed via desk review in the year following an onsite monitoring visit. In SFY’s 2017 and 2018, eligible entities found not in compliance with the organizational standards will be placed on a Technical Assistance Plan. DAAS/CAPS will begin formal monitoring for compliance with the organizational standards for SFY 2018, in SFY 2019.** |
|  | **FOR FFY 2018 – the CSBG Organizational Standards implementation and assessment policy clarification is attached. The following text in 6.4a was revised to read as follows: Eligible entities will be assessed for compliance annually via desk review, or at a biennial monitoring visit. DAAS/CAPS utilizes an agreed upon tool modified from a sample document published by the Community Action Partnership to assess eligible entities. Eligible entities will be assessed annually via desk review or at a scheduled monitoring visit. In response to input from the Network during Plan development, a detailed policy clarification was written to further define this process (6.4a). That document** |
In SFY 17 and 18, entities found not in compliance will be placed on a Technical Assistance Plan – this has not happened. This will make it hard for agencies to achieve compliance. The Network reviewed the draft policy on monitoring and is requesting an updated version. The text that was shared still lists a separate TAP tool. The Network also had the following questions: Can a desk review result in findings? Has the final monitoring tool been identified and/or have there been changes to the tool? The draft policy states there will not be findings but then goes in to define findings. It needs to be clarified what can result in a finding (vs. a deficiency) and starting when.

Section 6 - Organizational Standards for Eligible Entities

11/1/16 - This item may change in the OLDC system. We should revisit after the 1st of the year.

FFY 2017 - Network Comments – Section 6.6

Similar to the comment outlined above, the Network is concerned about the inclusion in this State Plan that 100% of agencies will meet ALL Organizational Standards when they are still in the process of being monitored/assessed for full compliance. This might be a reasonable expectation for FY 18 but currently seems out of alignment with the process being followed.

FFY 2018

4-24-17

Section 6.6 states that 75% of eligible entities are expected to meet all the State adopted organizational standards in the next year. The Network requests the following clarifications:

What is the number of agencies? Is the 75% based on 11 or 12?

Did the State (AZ) adopt all the organizational standards?

FFY 2017 - 7/25/16 - this amount was changed to 75% as the OLDC system would not accept/validate 0% in the field. This line item is under consideration by OMB as part of the Annual Report draft documents. Among members of the national Network, this item is a point of controversy. DAAS/CAPS will coordinate with the Network in SFY 2017 to come to agreement on the percentage to be listed here, after the OMB clearance process is completed and it is known if this line item is to be maintained or revised. DAAS/CAPS informed the Arizona Community Action Network of this issue and solicited comment. No comments were provided. This may be updated in the development year for SFY 2019.

5/3/2017

1. The percentage of agencies meeting standards is based upon the number of agencies assessed. All 12 agencies will be assessed by the end of SFY 2017.

2. Checkbox 6.1 indicates Arizona has adopted the organizational standards. No further changes to plan document.

Section 7 - State Use of Funds

7.1 indicates the funding formula type by a multiple choice checkbox. The current funding formula description is included in a separate document, Attachment 3A, Funding Formula, drawn from the previous Plan and data source updates, DES has previously provided OCS with this information in the CSBG IS Report. Item 7.2 indicates planned allocations to eligible entities for FFY’s 2017 and 2018. Attachment 3 is a copy of the CSBG March Alert indicating DES communication of planned allocations for SFY 2017 to the Community Action Network. The totals auto populate. 7.3-7.4 describe the distribution process and timeframe. This is new text, not included in previous plans. Item 7.5 asks the State to describe any improvements it made.

FFY 2018:

To be updated
made to the grant and/or contract administration process from previous State Plans that were the result of feedback from the Community Action Network (CAN), OCS, etc. DES gives a brief description of the Government Transformation and lean initiative project underway. Going forward, this item will prompt DES to obtain feedback from the above mentioned sources and determine if performance management adjustments are necessary.

2/2017 – Funding formula revised. See attachment.

11/1/16 – Per the last paragraph, this item will be discussed in workgroup for FFY 2018. MAY UPDATE FOR FFY 2018 PENDING FUNDING FORMULA DISCUSSION (LIKELY)

Section 7 - State Use of Funds


FFY 2018: TO BE UPDATED 5/4/17: Text added: Federal allocation exceeded forecasted amount. Therefore, the hold harmless provision was not invoked for SFY 2018.

Section 7 - State Use of Funds

7.3. Narrative updated for FFY 2017. See Attachment 3, FFY 2017 Funding Formula. Information derived from the FFY 2016 State Plan Amendment document, Section V. B. Note: The source for the unemployment factor has been changed from the Arizona Department of Administration Unemployment Statistics Program Special Unemployment Report to the most recent annual Local Area Unemployment Survey (LAUS). Text tweaked for format compatible with OLDC.

FFY 2017 - 7/7/16: Public Hearing: Coconino County Community Services Department – With all the economic background provided at the beginning of our comments, Coconino County is very grateful that the Arizona Department of Security is undertaking a thorough evaluation of the current funding distribution formula, that which is described in Attachment 3A, and in Section 7 of the Plan. We strongly recommend that the Cost of Living Index be made a part of further funding formulas.

FFY 2018

7/20/16: DAAS/CAPS acknowledges the comments and will indicate in the State Plan under Section 7.5 - Performance Management Adjustment, the following: “In SFY 2016, DAAS/CAPS and the Network initiated a workgroup project to evaluate the funding distribution formula factors. In SFY 2017, DAAS/CAPS engaged a consultant to conduct research and report to the group best practices utilized by other states, and additional data sources that may be of use in an updated formula. DAAS/CAPS will provide an update to the funding formula discussion in the amendment for FFY 2018.”

Section 7 – State Use of Funds

7.4. Distribution processes and timeframe. See new narrative text added. Item 7.5: “Performance management adjustment” asks DES to describe any changes/improvements made to “grant and/or contract administration procedures” from previous Plans. New narrative added. No corresponding item in previous Model Plans.

FFY 2018: Network comments: OCS had asked about the fiscal year and availability of funds. DES provided a description of the process, but does not seem to address the 30-day issue. The Network would like to request that DES provide actual draft language for the Network to review.

7.4a – Actual verbiage/new in bold: For this amendment: The State operates on a State Fiscal Year. Funds allocated to eligible entities are made available for obligation on the first day of the State Fiscal Year. Funds are disbursed on a cost reimbursement basis. Eligible entities annually submit a proposed Itemized Service Budget (ISB) document, for detailing allowable expenditures for activities included in the agency’s CAP Plan. Eligible entities invoice the State on a monthly basis for these allowable expenditures under CSBG. Invoices are due on the 25th of each month. Larger public entities may be allowed to invoice semi-monthly upon DAAS/CAPS approval. Invoices must include backup documentation for expenditures billed. DAAS/CAPS is bound by contract with the
<table>
<thead>
<tr>
<th>Facts for discussion about the State CSBG Office process for making CSBG funds available:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Arizona uses a cost reimbursement model to disburse CSBG and other funds. The State allocates and makes available funding to the CAAs, using funding formulas with variables as follows:</td>
</tr>
<tr>
<td>- The State includes CSBG and LIHEAP, as well as TANF, and several other funds as components of the Community Action Program and Services contract.</td>
</tr>
<tr>
<td>- The available funding is forecast in advance of the new State fiscal year (July-June). The allocations forecast is based upon the previous year’s funding, and estimated funding available is communicated to the network in a bulletin, officially called an “Alert”. These are usually issued in March, prior to the start of the State fiscal year.</td>
</tr>
<tr>
<td>- Contracts are issued shortly thereafter, signed and returned prior to July 1.</td>
</tr>
<tr>
<td>- CAAs may bill against the initial allocation if they have returned their signed contracts, and the new fiscal year has begun.</td>
</tr>
<tr>
<td>- If actual funding amounts change, the State issues a new bulletin, and amends the contracts.</td>
</tr>
<tr>
<td>- Carryover is determined, and made available via another Alert, and a subsequent contract amendment occurs in August or September.</td>
</tr>
<tr>
<td>- Agencies provide an itemized service budget (ISB), with their annual application for funds. Then, they bill monthly for all direct and indirect expenditures for allowable activities.</td>
</tr>
</tbody>
</table>

eligible entities to make payments on approved invoices within 30 days. Payments on invoices may be delayed temporarily pending the submission of past-due contract deliverables, such as Community Action Plan documents or required reports, or for incomplete documentation.
<table>
<thead>
<tr>
<th>Section 7 – State Use of Funds 7.7</th>
<th>FFY 2018:</th>
</tr>
</thead>
<tbody>
<tr>
<td>11/9/16: This section may change depending upon the distribution of State administrative funds and any State personnel changes that will be in effect for FFY 2018. MUST UPDATE FOR FFY 2018 2013 – updates pending.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Section 7 – State Use of Funds and Section 8 State Training and Technical Assistance 7.9-7.11</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>7-7-10: Discretionary award amounts updated in table provided by OCS. Narrative consists of a description of awards given in the past year. Item 7.11 checkboxes to indicate the type of organizations receiving discretionary funds. The 7.11 information is usually reported on the annual CSBG IS Report. CSBG Program recommends adding verbiage indicating the plan for unspent discretionary funds. Section Item 8.1. Training and Technical Assistance (T/T/A), derived from previous (FFY 2016 Amendment) Plan, Section, D. Section 8 (T/T/A) is referred to here as DES uses discretionary funds to provide training and technical assistance. Relevant dates updated. Maricopa County discretionary narrative will be updated to describe current use of carryover discretionary funds. Source for DAAS narrative: FFYs 2015-2016 CSBG State Plan Amended, Section V., Section V. D., FFYs, 2015-2016. 11/9/16: SHOULD UPDATE FOR FFY 2018 CSBG Program suggests reviewing verbiage in this area relative to any CSBG Discretionary funds carried over, and any special projects funds not awarded during the applicable fiscal year. Currently, this is covered in the Attachment 3, “Allocations 2017”. CSBG Program further suggests adding this verbiage to the front end of the plan document in Section 7.11, instead of an attachment. 2/2017 - updated.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Section 8 State Training and Technical Assistance</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>8.1 Sources: CSBG State Plan Document, Section V. D., FFYs, 2015-2016, Amended for FFY 2016 and FFY 2016 form SF-424. OCS requests a description of the State’s technical assistance plan with timeframes. See also Section 8.4 of the State Plan document. FFY 2018 MUST UPDATE FOR FFY 2018 and include narrative describing our current coordination efforts for TTA going forward.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Section 8 – Training and Technical Assistance</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>The Network is requesting that DAAS outline what is done with the discretionary CSBG dollars if they go unspent within a given fiscal year? The Network would like clarification on whether there is a separate set aside for unforeseen emergencies or is this included in the $88,820? FFY 2018: The Network requests inclusion of more information about the disposition of unused discretionary funds. Will unused funds be carried over as discretionary funds? Will they be redistributed based on the funding formula? The CSBG Discretionary funds allocated for emergencies and disasters are $30,000, in addition to the $88,820 allocated for special projects. There is no option to attach the allocations document in this area of the Plan in OLDC. Attachment 3 addresses the unspent funds, and a narrative was added to address the carryover funds for special projects and emergencies. 7/11/16: DAAS/CAPS has further stipulated that CSBG discretionary funds allocated for special projects ($88,820) that are not awarded for the upcoming SFY, will be made available for emergencies and disasters in addition to the $30,000 allocated for this purpose. New text: CSBG discretionary awards for SFY 2017 described. 2/2017: Regarding Special Projects funds: Text Added: If all funds are not awarded during the current fiscal year, these funds may be used for emergencies and disasters should the need arise during said year. Remaining unobligated funds will be carried over to the next grant year, and redistributed with the 90 percent funds allocated to eligible entities. Regarding Emergencies: Viewpoint from Attachment 3 allocations 2017. Unobligated funds from the current plan year will be carried over to the next grant year, and redistributed with the 90 percent funds allocated to eligible entities.</td>
<td></td>
</tr>
</tbody>
</table>

| Sources: CSBG State Plan Document, Section V. D., FFYs, 2015-2016, Amended for FFY 2016 and FFY 2016 form SF-424. OCS requests a description of the State’s technical assistance plan with timeframes. See also Section 8.4 of the State Plan document. FFY 2018 MUST UPDATE FOR FFY 2018 and include narrative describing our current coordination efforts for TTA going forward. |

<table>
<thead>
<tr>
<th>Network Comments – Section 8.1</th>
<th>FFY 2018:</th>
</tr>
</thead>
<tbody>
<tr>
<td>In addition to the topics outlined above, the Network requests inclusion of the following training priorities: 1. ROMA Next Generation 2. Creating and implementing a meaningful CAP Plan 3. Evidenced Based, High Impact, Outcome Driven Programming – ROMA NEXT</td>
<td></td>
</tr>
</tbody>
</table>

| CAPE Items of concern from the Network added, such as those addressing ROMA Next Gen, CAP Plans and Self-Sufficiency Matrix. DAAS/CAPS and the Arizona Community Action Association will continue to coordinate and agree upon topics and adjust schedules for SFY’s 2017 and 2018. 7/11/16: DAAS/CAPS will work to develop and deliver case management training in SFY 2017. The CSBG Plan Training and
4. Technical Assistance on using the Self Sufficiency Matrix to track client outcomes  
7/6/16: Pima County Community Services Department commented requesting case management training be added to the training and technical assistance schedule. Pima County also requested clarification to section 8.2.

**FFY 2018:**

The Network is requesting an actual TTA plan, if necessary action steps to develop such a plan, deadlines and explanation who would provide the TTA.

The Network would like to see a plan that shows the State’s responsibility for TTA as distinct from ACAA activities. DAAS should also indicate how they identified the categories for TTA, e.g. due to monitoring. The Network would like to suggest a thorough needs assessment (in addition to the ACAA survey already completed).

**4-24-2017**

Does ROMA training listed in the table include ROMA Next Generation, including the new annual report? What is the benefit of offering ROMA training if changes will be made soon due to ROMA NG?

<table>
<thead>
<tr>
<th>Section – 8 State Training and Technical Assistance</th>
</tr>
</thead>
<tbody>
<tr>
<td>8.2 Technical Assistance Plan</td>
</tr>
</tbody>
</table>
| **FFY 2018: MUST UPDATE FOR FFY 2018.** TAP Plan has been incorporated into existing monitoring tools.  
2/2017 Text added: “to facilitate agencies implementing and attaining compliance. DAAS will track unmet standards, needed documentation, time-bound objectives toward compliance via the DAAS Contracts Report of Findings (ROF) document. DAAS/CAPS will use this document to provide a summary of the State assessment. Standards that are unmet, or met but needing documentation, or currently implementing, will be listed as Recommendations, and summarized with requested actions and due dates.  
Network Comments – Section 8 The Network is not aware of this Technical Assistance Plan or Quality Improvement Plan Section 8.2 indicates is in place. The Network is requesting the opportunity to review this document.  
**FFY 2018:**
| Section 8.2 changed to "no". DAAS/CAPS is developing a tool for creating a TAP for eligible entities with unmet Organizational Standards which it is testing for workability during the State Assessment period. 7/11/16: A draft copy of a proposed Technical Assistance Plan tool has been distributed to the Network for review and comment.  
2/2017 Technical Assistance will be tracked using the CSBG Organizational Standards Monitoring Tool, and the existing Report of Findings tool. The proposed TAP Tool draft was discontinued. References to a formal TAP tool were removed.  
8.0 T/TA plan updated with to include items from the developing T/TA plan by ACAA.  
5/5/17: Change: Regarding TAPs and QIP – No changed to Yes due to one QIP; Text added 8.4: DAAS/CAPS is continuing its development of T/TA in coordination with the state association, Arizona |

Technical Plan draft contains a line item for “Program Delivery” to be delivered in FFY1 – Q3. This training has the DAAS/CAPS case management component.

Section 8.2 applies to the CSBG organizational standards. Narrative related to other training and technical assistance is moved to 8.4.

2/2017 - DAAS/CAPS is working with ACAA in SFY 2017 to develop a concrete technical assistance plan.

5/4/2017: Note: Yes, the ROMA Training will consist of the existing ROMA concepts and ROMA Next Generation training that is provided and recommended by national partners, The Center for Applied Management Practices, Inc., and The National Peer-to-Peer ROMA Training and Certification Program. The curriculum for Results Oriented Management and Accountability (ROMA) training, has not changed. The annual reporting mechanism has changed, and the related data elements to be collected and reported have changed. Training related to this data collection and reporting system will fall under the heading of “CSBG Annual Report”. The ROMA cycle, and its components, assessment, planning, implementation, achievement, and evaluation, is still in place. ROMA Next Generation annual reporting reflects a greater emphasis on measuring outcomes over time, and ties into the organizational standards in that it also places greater emphasis the demonstration and documentation of the utilization of the ROMA cycle in agency operation.

Added/changed: added TTA indicated by ACAA in draft TTA Plan. Indicated using QIP (one agency)
### SECTION 9 - State Linkages and Communication

**9.1-9.2 – State Linkages and Communication**

**FFY 2018:** To be discussed. May be redesigned for FFY 2019, plan development year.

*The Network requests that significant modifications be made to this section. The Network thinks it is crucial that the State (DAAS) be creating linkages with those listed above in addition to:*

1. Head Start
2. Public Health
3. Child Welfare
4. Aging
5. Faith Based Organizations
6. Educational Institutions

The Network is requesting that DAAS utilize section 9.2 to outline how they are coordinating with these entities.)*

7/7/16: Network comment - Coconino Community Services Department – “WIOA was not included in the list of programs with which the State needs to make a direct connection and create a collaborative process for service to families throughout the State. Community Action Agencies were specifically cited in the Workforce Investment Opportunity Act as Partners. We encourage the State of Arizona to move swiftly, with our input, to develop a meaningful plan to address how the State will be integrating program areas and goals, as well as creating a nexus for the agencies to do so as well.”

Pima County Community Services Department also commented, requesting clarification on this item.

**FFY 2018**

The Network would like more specifics on how linkages at the State level are created, describing goals for the linkages, a work plan, and an explanation what the impact is, what NPIs are affected, and how the relationships benefit the Network.

This section can build on the CAP plans where CAAs report on their linkages, but the State should describe state-level activities. An example that was suggested previously was building relationships with WIOA/AZWork. DES/DAAS could use language from the IM on coordinating community action with workforce programs. The plan can build on local activities (e.g., x

No changes were made at this time. This language was carried over from FFYs 2015-2016 CSBG State Plan document.

DAAS/CAPS has begun conversations with some of the organizations/agency divisions operating the programs listed in Section 9 and in the Network comments. DAAS/CAPS will discuss with the Network in SFY 2017 and update this Section in the FFY18 plan submittal. 7/11/16: 9.1 The State WIOA office was included in the checkboxes in this section of the Plan. The State Plan document is revised to clarify State role in making federal assurances regarding linkages and communication. Enhanced responses related to Section 9 questions are added to the OLDC document and removed from Attachment 4. Attachment 4 will contain only program narrative material derived from submittals from CAAs to serve as examples of assurances stated in Section 14. Added to 9.2: “DAAS/CAPS will continue its conversations with the State WIOA office in SFY 2017. DAAS/CAPS will investigate opportunities to coordinate and/or exchange information with the State offices of Head Start (Education Department), Public Health, and Child Welfare. DAAS/CAPS CSBG program staff participate in the activities of the DES Office of Community Engagement, which is at this time engaging the Child Support Services Office in an effort to link non-custodial parents with services that may better enable them to meet child support obligations. DAAS/CAPS provides CSBG discretionary funding to ACAA (State Association) to provide coordination among programs. DAAS/CAPS will discuss further with the Network a plan for coordination of program activities with other State agencies in SFY 2017.

5/4/17: 9.2: Text added: DAAS/CAPS initiated linkages with several eligible entities and the State’s WIOA and Child Support Enforcement offices in FFY 2017. This work is ongoing.

**Note:** For FFY 2019, DAAS/CAPS will develop narrative content as suggested in the bolded text in the Network remarks at the left. 5/5/17: 9.10 and 9.11 These narrative sections will be redeveloped in SFY 2018 for FFY 2019.

5/4/17: 9.2: Text added: DAAS/CAPS initiated linkages with several eligible entities and the State’s WIOA and Child Support Enforcement offices in FFY 2017. This work is ongoing.

**Community Action Association (ACAA), which is participating in the Regional Performance and Innovation Consortia (RPIC) T/TA Plan development project. Development of new T/TA is ongoing, and the T/TA Plan should be finalized by early FFY 2018.**
### SECTION 10 Monitoring, Corrective Action, and Fiscal Controls

| 10.1 | Section requests detail regarding monitoring and monitoring reports not requested in the previous plan model, including a monitoring schedule and the inclusion of written monitoring policies. Section 6 contains detailed information regarding monitoring. | The Network is requesting clarity on the Full onsite review in relation to the Organizational Standards. Is the plan to exempt Organizational Standard compliance from this review until FY18? ACAAs - Again, the Network is requesting access to the Technical Assistance Plan document as no one is currently utilizing one to ensure they are coming into compliance with Organizational Standards by 2018. FFY 2018: SHOULD UPDATE FOR FFY 2018 TAP Plan is incorporated into existing monitoring tools; a separate TAP tool will not be used. Must update for FFY 2019. In response to the comment regarding full on-site review in Section 10.1, see Attachment 6.4a. The Technical Assistance Plan document is in draft form and will be shared and discussed with the Network prior to finalization and formal utilization. 7/11/16. The State Plan indicates agencies are expected to reach full implementation by SFY 2018. Eligible entities assessed during onsite monitoring in SFY 2016 and 2017 will be assessed by desk review in SFYs 2017 and 2018, respectively. DAAS/CAPS will still be performing initial State assessments in SFY 2017. However, the State Plan, and the policy document in development, will indicate DAAS/CAPS will not begin to make formal monitoring findings with respect to organizational standards compliance status until SFY 2019, in accordance with the State monitoring schedule. Currently, DAAS/CAPS solicits a Corrective Improvement Plan (CIP) from the eligible entity and tracks time-bound objectives toward the remedy of findings and deficiencies. For serious deficiencies, the State Office of Procurement may issue a demand for assurance to the eligible entity for findings related to fiscal and administrative Terms and Conditions of the DAAS/CAPS contract. DAAS/CAPS follows up with the agency to assure the completion of the CIP, making follow up visits if necessary and providing technical assistance. DAAS/CAPS is developing a TAP tool to be used to track technical assistance and efforts toward compliance with the CSBG organizational standards. DAAS/CAPS believes it is more appropriate for the State to assist eligible entities making good faith efforts to comply in achieving compliance than it is to make findings. A draft TAP tool has been sent to the Network for review and comment. 5/5/17: Development of a separate TAP tool has been suspended, and DAAS/CAPS is using the agreed upon Organizational Standards Monitoring Tool and the existing Report of Findings document to track progress on recommendations and findings as well as progress in meeting the Organizational Standards. DAAS/CAPS currently has one agency that is nearing completion of a CIP. |
| 10.4a | Reporting of QIPs: DAAS/CAPS does not currently report eligible entities on QIP’s, or Corrective Improvement Plans (CIPs), to OCS in DAAS/CAPS terminology. Organizational Standards are still in the implementation phase and eligible entities found deficient will be offered technical assistance as appropriate at this time. FFY 2018: SHOULD UPDATE FOR FFY 2018 TAP Plan is incorporated into existing monitoring tools; a separate TAP tool will not be used.Must update for FFY 2019. | The Network is requesting an updated policy and clear communication on any deficiencies or findings. In response to the comment regarding full on-site review in Section 10.1, see Attachment 6.4a. The Technical Assistance Plan document is in draft form and will be shared and discussed with the Network prior to finalization and formal utilization. 7/11/16. The State Plan indicates agencies are expected to reach full implementation by SFY 2018. Eligible entities assessed during onsite monitoring in SFY 2016 and 2017 will be assessed by desk review in SFYs 2017 and 2018, respectively. DAAS/CAPS will still be performing initial State assessments in SFY 2017. However, the State Plan, and the policy document in development, will indicate DAAS/CAPS will not begin to make formal monitoring findings with respect to organizational standards compliance status until SFY 2019, in accordance with the State monitoring schedule. Currently, DAAS/CAPS solicits a Corrective Improvement Plan (CIP) from the eligible entity and tracks time-bound objectives toward the remedy of findings and deficiencies. For serious deficiencies, the State Office of Procurement may issue a demand for assurance to the eligible entity for findings related to fiscal and administrative Terms and Conditions of the DAAS/CAPS contract. DAAS/CAPS follows up with the agency to assure the completion of the CIP, making follow up visits if necessary and providing technical assistance. DAAS/CAPS is developing a TAP tool to be used to track technical assistance and efforts toward compliance with the CSBG organizational standards. DAAS/CAPS believes it is more appropriate for the State to assist eligible entities making good faith efforts to comply in achieving compliance than it is to make findings. A draft TAP tool has been sent to the Network for review and comment. 5/5/17: Development of a separate TAP tool has been suspended, and DAAS/CAPS is using the agreed upon Organizational Standards Monitoring Tool and the existing Report of Findings document to track progress on recommendations and findings as well as progress in meeting the Organizational Standards. DAAS/CAPS currently has one agency that is nearing completion of a CIP. |
| 10.9 | From the FFYs 2015-2016 CSBG State Plan document Section IV (B)(a)-(e). See also Attachment 7 Scope of Work 2016-2020. Bold text added for clarification. | 5/5/17. -10.14 Text added: FOR THIS AMENDMENT: DAAS/CAPS will have its processes assessed by a third party consultant in late SFY 2017. Any adjustments will be reflected in the FFY 2019 CSBG State Plan. |

**MUST UPDATE FOR FFY 2018**

- **SECTION 10**

  - **Monitoring, Corrective Action, and Fiscal Controls**

  - **10.1** Section requests detail regarding monitoring and monitoring reports not requested in the previous plan model, including a monitoring schedule and the inclusion of written monitoring policies. Section 6 contains detailed information regarding monitoring.

  - **10.4a** Reporting of QIPs: DAAS/CAPS does not currently report eligible entities on QIP’s, or Corrective Improvement Plans (CIPs), to OCS in DAAS/CAPS terminology. Organizational Standards are still in the implementation phase and eligible entities found deficient will be offered technical assistance as appropriate at this time.

  - **FFY 2018:** SHOULD UPDATE FOR FFY 2018 TAP Plan is incorporated into existing monitoring tools; a separate TAP tool will not be used. Must update for FFY 2019.
### Section 11 - Eligible Entity

**Tripartite Board**

| FFY 2018: No planned changes |

### Section 12 - Individual and Community Income Eligibility Requirements

| FFY 2018: MUST UPDATE FOR FFY 2018. Updates to income thresholds – no other planned changes |

**FFY 2018:**

The Network requests a description be added on the use of categorical eligibility. Several CAA:s are or will be using it, and the process and options for utilizing it should be described in the state plan.

For this amendment: Income eligibility for CSBG funded direct services will follow the rules for the service being provided. If CSBG funds are used to provide a service under the Short Term Crisis Services, the income eligibility requirements for that program will apply. Conversely, for utility assistance, the income eligibility requirements would follow those for LIHEAP. Eligible entities may consider income eligibility for TANF funded or LIHEAP funded programs to indicate categorical income eligibility for any CSBG funded service.

5/5/2017 12.2 Text added: For this amendment: Income eligibility for CSBG funded direct services will follow the rules for the service being provided. If CSBG funds are used to provide a service under the Short Term Crisis Services, the income eligibility requirements for that program will apply. Conversely, for utility assistance, the income eligibility requirements would follow those for the State’s utility assistance program. Eligible entities may consider income eligibility for TANF funded or LIHEAP funded programs to indicate categorical income eligibility for any CSBG funded service.

### Section 13 - Results Oriented Management and Accountability (ROMA) System

| FFY 2018: No planned changes. |

**FFY 2018:**

For this Amendment: DAAS/CAPS has begun work with ACAA:s to develop a new model CAP Plan that should be completed during SFY 2018.

5/5/17: DAAS/CAPS and ACAA:s in agreement with the Network have postponed the discussion of a new CAP Plan template until SFY 2019.

7/14/16: Section 13.5 of the CSBG State Plan Draft reads “Submission of a Community Action Plan by the eligible entity is required by contract at least once every two years, and during the contract renewal period, as part of the eligible entity’s application package.” DAAS/CAPS will issue a policy clarification on this topic and revise scopes of work to reflect this option. DAAS/CAPS will initiate discussion with the Network in SFY 2017 to develop an updated model CAP Plan template that better reflects the Network’s objectives and aligns with the CSBG Organizational Standards.

13.3-13.4 to be revisited for SFY 2019.
### Section 14 CSBG Programmatic Assurances and Information Narrative

<table>
<thead>
<tr>
<th>14.1, Attachment 4, Section 14 Narrative Responses - State Linkages and Communication.</th>
</tr>
</thead>
<tbody>
<tr>
<td>FFY 2018: Extensive revision and updates needed by FFY 2019.</td>
</tr>
</tbody>
</table>

2017: The Network is concerned that Attachment 4 - State Linkages and Communication, does not demonstrate assurances effectively. Example: Assurance that funds are used to secure and retain meaningful employment – "Eligible entities provide employment supports and coordinate with WIOA programs. Some entities operate employment assistance in their own facilities." This answer doesn't demonstrate how DAAS assures that eligible entities provide employment supports so that funds are used to help low-income individuals secure and retain meaningful employment. This is the case throughout Attachment 4.

7/7/16 Public Hearing Comment: Coconino County Community Services Department – "Increased benefits for working poor: there is a reference to increased benefit levels for applicants reporting income in this section of the plan in Attachment 4, 14.1a 676(b)(1)(i)(1). We believe that the accurate reference here should be the working poor, but that is left to interpretation. Therefore, we recommend an explanation of the intended meaning." Pima County also mentioned that "the State's role. Responses to questions 14.3 were made in the 2018 amendment worksheet. Portions of Attachment 4 were reworked in response to the Network's concerns. Program narrative text will be reviewed again by the Network, and may be revised prior to final submission of the State Plan and/or in the FFY 2018 amendment. Regarding the example provided, it could be revised as follows: 7/11/16: Section 14 is substantially revised to clarify the State's role in making the federal assurances contained therein. DAAS/CAPS reviewed responses for this Section made by other states and discussed Network concerns and suggestions with ACA,

### 14.3-14.13 – Program narrative examples.

FFY 2018: Narrative material may be updated. This could wait until FFY 2019.

The Network is concerned that Attachment 4 - State Linkages and Communication, does not demonstrate assurances effectively. Example: Assurance that funds are used to secure and retain meaningful employment – "Eligible entities provide employment supports and coordinate with WIOA programs. Some entities operate employment assistance in their own facilities." This answer doesn't demonstrate how DAAS assures that eligible entities provide employment supports so that funds are used to help low-income individuals secure and retain meaningful employment. This is the case throughout Attachment 4.

Portions of Attachment 4 were reworked in response to the Network's concerns. Please see revised version. Program narrative text will be reviewed again by the Network, and may be revised prior to final submission of the State Plan. Regarding the example provided, 14.1a.(i) in Attachment 4 is revised as follows: "Eligible entities provide employment support services listed in ROMA NPI 1.2 through the State Short Term Crisis Services Program, and through CSBG funded services. Eligible entities also coordinate with WIOA programs. Some entities operate employment assistance programs in their own facilities." 7/19/16: Section 14 responses were further revised to clarify the State's role. Responses to questions 14.3-14.4 were made in the Attachment 4 was reworked in response to the Network's concerns.

5/12/2017 10:24 AM
<table>
<thead>
<tr>
<th>Section 15</th>
<th>FFY 2018: This will not change.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Additional Comment Space</td>
<td></td>
</tr>
<tr>
<td>Section [ ]</td>
<td></td>
</tr>
<tr>
<td>Section [ ]</td>
<td></td>
</tr>
<tr>
<td>Section [ ]</td>
<td></td>
</tr>
<tr>
<td>Section</td>
<td></td>
</tr>
<tr>
<td>---------</td>
<td>---</td>
</tr>
</tbody>
</table>
Division of Aging and Adult Services

ALERT

Attachment 3 - SFY-18-A1

Community Services Block Grant (CSBG) for SFY 2018

The Division of Aging and Adult Services (DAAS) allocated $5,868,290 of CSBG funding for State Fiscal Year (SFY) 2018. This amount is significantly higher than the SFY 2017 initial allocation, due to an increase in the FFY 2016 grant that was not placed in the SFY 2017 contracts. This causes a “bubble” in the SFY 2018 funding that will result in a decrease for SFY 2019 if grant funding remains the same. Following deliberations with the Network that led to an agreement on data sources and funding factors to be used, beginning in SFY 2018 and going forward, the funding formula for CSBG has been revised for SFY 2018 as follows:

Funds will be distributed based on the following factors: number of individuals at or below 125 percent of the Federal Poverty Level, urban or rural status, individuals under 50 percent of the Federal Poverty Level considered extreme poverty and a minimum funding variable. The sources used for the poverty data were the 2015 Five year American Community Survey and the 2010 United States Census for the rural factors, respectively.

<table>
<thead>
<tr>
<th>Poverty Factor</th>
<th>Rural Factor</th>
<th>Extreme Poverty</th>
<th>Tribal Adjustment</th>
<th>Migrant/Seasonal Farmworker Adjustment</th>
<th>Minimum Funding Variable</th>
</tr>
</thead>
<tbody>
<tr>
<td>90%</td>
<td>5%</td>
<td>5%</td>
<td>Yes</td>
<td>2%</td>
<td>$150,000</td>
</tr>
</tbody>
</table>

The unemployment factor has been removed; the poverty factor was increased from 85 percent to 90 percent, the extreme poverty factor of five percent was added, and the minimum funding variable remained unchanged.

For SFY 2018, agencies were to be held harmless for 50 percent of reductions, if said reduction is eight percent or greater. However, due to increased allocations, no eligible entities lost sufficient funding to trigger the hold-harmless formula.

CSBG Funds are allocated to designated Community Action Agencies.

<table>
<thead>
<tr>
<th>Agency</th>
<th>Allocation</th>
</tr>
</thead>
<tbody>
<tr>
<td>City of Glendale Community Action Program</td>
<td>$232,350</td>
</tr>
<tr>
<td>City of Phoenix Human Services Department</td>
<td>$1,609,418</td>
</tr>
<tr>
<td>Coconino County Community Services Department</td>
<td>$150,000</td>
</tr>
<tr>
<td>Community Action Human Resources Agency</td>
<td>$355,893</td>
</tr>
<tr>
<td>Gila County Division of Health and Community Services</td>
<td>$150,000</td>
</tr>
<tr>
<td>Maricopa County Human Services Department</td>
<td>$977,885</td>
</tr>
<tr>
<td>Mesa Community Action Network</td>
<td>$361,063</td>
</tr>
<tr>
<td>Northern Arizona Council of Governments</td>
<td>$305,074</td>
</tr>
<tr>
<td>Pima County Community Action Agency</td>
<td>$887,354</td>
</tr>
<tr>
<td>Southeastern Arizona Community Action Program</td>
<td>$225,162</td>
</tr>
<tr>
<td>Western Arizona Council of Governments</td>
<td>$496,725</td>
</tr>
</tbody>
</table>

Subtotal $117,366

<table>
<thead>
<tr>
<th>Agency</th>
<th>Allocation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Portable Practical Educational Preparation, Inc.</td>
<td>$117,366</td>
</tr>
</tbody>
</table>

Total $5,868,290

Should you have any questions or require additional information, please contact your assigned Contract Specialist.
Attachment 3 - SFY-18-A1

Community Services Block Grant (CSBG) for SFY 2018

No changes will be made to the following CSBG discretionary funds for SFY 2018. DAAS will be working with Arizona Community Action Association to update and refine service deliverables to meeting Network and Department of Economic Security (DES)/DAAS projected needs.

<table>
<thead>
<tr>
<th>Agency</th>
<th>Priority Area</th>
<th>Allocation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Arizona Community Action Association</td>
<td>Statewide Coordination, Training and Technical Assistance Among Eligible Entities and DES/DAAS</td>
<td>$155,000</td>
</tr>
<tr>
<td></td>
<td></td>
<td><strong>Total</strong></td>
</tr>
</tbody>
</table>

Discretionary funds must be fully expended by June 30, 2018.

Should you have any questions or require additional information, please contact Tammy Frazee, Community Action Program Administrator, at 602-542-2895.
Attachment 3A

Section 7 – Details: CSBG State Plan FFYs 2017-2018 – Funding Formula –and Administrative Budget – AMENDED in SFY 2017

Distribution Formula

The distribution of CSBG funds to eligible entities is based upon the following formula factors:

<table>
<thead>
<tr>
<th>Poverty Factor</th>
<th>Rural Factor</th>
<th>Extreme Poverty</th>
<th>Tribal Adjustment</th>
<th>Migrant/Seasonal Farmworker Adjustment</th>
<th>Minimum Funding Variable</th>
</tr>
</thead>
<tbody>
<tr>
<td>90%</td>
<td>5%</td>
<td>5%</td>
<td>Yes</td>
<td>2%</td>
<td>$150,000</td>
</tr>
</tbody>
</table>

In SFY 2018, eligible entities will be held harmless to 50 percent of any decrease from the previous state fiscal year resulting from the new funding formula.

- **Poverty**

  Ninety percent of funds are distributed according to the number of persons living at or below 125 percent of poverty in a given geographic area. Tribal households residing on reservations receiving direct CSBG funds are not included in the calculations. Poverty statistics are obtained from the most current U.S. Decennial Census data available for the State of Arizona, and updated using the American Community Survey for 2015, for a five-year period (2011-2015).

- **Extreme Poverty**

  Five percent of funds are distributed according to the number of households living at or below 70% of poverty in a given geographic area. Tribal households residing on reservations receiving direct CSBG funds are not included in the calculations. Poverty statistics are obtained from the most current U.S. Decennial Census data available for the State of Arizona and updated using the American Community Survey for 2015, for a five-year period (2011-2015).

- **Rural**

  Five percent of funds are distributed only to rural counties based upon a determination of special needs such as disproportionately high unemployment, logistical challenges such as availability of transportation, distances to and from remote areas and disproportionate cost and availability of energy and other essential services. Rural statistics are obtained from the most current U.S. Decennial Census data available for the State of Arizona.
• **Tribal Adjustment**

In 1982, American Indian Tribes within the State were given the opportunity to apply for funding directly from the Department of Health and Human Services. The tribes receive approximately 15 to 20 percent of the State’s gross allocation. American Indian populations residing on reservations receiving separate CSBG allocations are excluded from the funding formula.

• **Migrant and Seasonal Farmworker Adjustment**

Two percent of funds allocated to eligible entities is reserved for a designated limited purpose entity serving migrant or seasonal farmworkers and their families statewide.

• **Minimum Funding Variable - $150,000**

All eligible entities are guaranteed a minimum allocation of $150,000 depending upon availability of funds.

Agencies will receive a proportional share of any increase or decrease to the State’s appropriation.

• **Administrative Budget**

The State will not expend more than the greater of $55,000 or five percent of its allotment under Section 674 of the Act for administrative expenses, including monitoring activities. Arizona will not use CSBG funds for Charity Tax Credit Programs. The State maintains accounting procedures established to assure that the administrative cost limitation is not exceeded. Regular meetings will be held to discuss the level of expenditures. The State’s Office of Accounting will prepare monthly reports. In the event that the State does not use the entire five percent of the total reserved for the ADES administrative expenses, the remainder may also be used to fund discretionary activities.

The State’s projected administrative budget is as follows:

<table>
<thead>
<tr>
<th>Administrative Budget – SFY 2018 Amendment</th>
<th>2017</th>
<th>2018</th>
<th>TBD</th>
</tr>
</thead>
<tbody>
<tr>
<td>Personnel</td>
<td>$121,000</td>
<td>$121,000</td>
<td>TBD</td>
</tr>
<tr>
<td>Employee Related Expenses</td>
<td>$56,000</td>
<td>$51,000</td>
<td></td>
</tr>
<tr>
<td>Professional &amp; Outside</td>
<td>$39,500</td>
<td>$1,800</td>
<td></td>
</tr>
<tr>
<td>Travel</td>
<td>$3,000</td>
<td>$5,600</td>
<td></td>
</tr>
<tr>
<td>Other Operating</td>
<td></td>
<td>$4,600</td>
<td></td>
</tr>
<tr>
<td>Occupancy</td>
<td></td>
<td>$1,100</td>
<td></td>
</tr>
<tr>
<td>Non-Capital Equipment</td>
<td>$4,000</td>
<td>$43,500</td>
<td></td>
</tr>
<tr>
<td>Indirect</td>
<td>$50,320</td>
<td>$61,960</td>
<td></td>
</tr>
<tr>
<td>Total:</td>
<td>$273,820</td>
<td>$290,560</td>
<td></td>
</tr>
</tbody>
</table>
Attachment 4

CSBG State Plan FFYs 2017-2018
Section 14 –Supplemental: Program Narratives

The 12 eligible entities provide services to low-income individuals and families in diverse geographic areas and communities. These agencies provide an array of comprehensive services including case management, client advocacy, household budgeting assistance, tax preparation and emergency assistance including eviction prevention, transportation assistance, such as gasoline, bus passes and emergency vehicle repair, and utility assistance services.

Eleven eligible entities in Arizona offer services through the Low Income Home Energy Assistance Program (LIHEAP) and seven eligible entities offer the Weatherization Assistance Program (WAP).

All eligible entities coordinate CSBG funding with Temporary Assistance for Needy Families (TANF) funds to provide a State-mandated emergency assistance program. Arizona’s eligible entities also provide high impact services such as vocational training and Individual Development Account (IDA) programs with leveraged funding from local private charities.

Additional high-impact services include intensive case management, counseling and programs that encourage better use of available income, loan modification programs to prevent foreclosure, and sponsoring events and forums to encourage engagement of the low-income community.

In addition to providing direct services, Arizona’s eligible entities work in partnership with both public and private organizations throughout their communities to address the issues of poverty in their local areas.

The Community Action Network in Arizona has been able to maximize CSBG funds to attract additional resources from federal, state, local, and private organizations. During the State fiscal year 2015, eligible entities leveraged CSBG funds to attract outside resources at a ratio of approximately 23 to 1. This return on investment illustrates the efficient manner in which the Community Action Network in Arizona uses CSBG to form partnerships with other organizations in assisting low-income households with progress toward self-sufficiency and addressing the causes of poverty. The State established this ratio using a federally prescribed formula that takes the SFY 2015 CSBG IS Report Section F.15: “Other Resources Administered and Generated by the CSBG Network”, total of $124,921,756, including the value of volunteer hours; and dividing by the SFY 2015 CSBG Network Distribution and Allocation of Funds Total of $6,179,967 for the 12 eligible entities.

What follows on the next page are some examples of the work performed by the Arizona Community Action Network.
Sample Eligible Entity Narratives

The following narratives were provided by the eligible entities and edited for clarity and length. DES may add additional or updated narratives in the FFY 2018 amendment.

Coconino County Community Services Department (CCCS)

Individual Development Account Post-Secondary Program, “$ave2Learn”: This program targets low-middle income individuals wanting to pursue a post-secondary education in Coconino County. The agency is a subgrantee under a project grant that will run for at least five years. The capacity is directly tied to the amount of local match funds raised. Since January of 2015, the agency has raised $40,000 which will enable at least 20 students, and as many as 40, who are enrolled and attending Coconino Community College.

CCCS approached Coconino Community College about a partnership, an Intergovernmental Agreement was approved by the College Governing Board and the Coconino County Board of Supervisors. CCCS applied for and was awarded one full time VISTA AmeriCorp volunteer who operates out of the College campus, as well at Community Services marketing, promoting, engaging, and enrolling students in the program. CCCS has promoted the program in public forums as well as written media across the County. Coconino Community College has expressed gratitude for the program, and highlighted it at its most recent Annual Breakfast, only 9 months into the program.

From January 2015–June, 2015, 16 students were recruited for the “$ave2Learn” IDA Program. CSBG funds were used to support the administration of and the VISTA match for the program.

Local partners included are Coconino Community College, Goodwill of Northern Arizona, Alliance Bank of Arizona, Sunwest Bank of Arizona, Dougherty Foundation, Unisource Energy Services, Coconino County, and the Raymond Foundation.

Pima County Community Action Agency in Partnership with Interfaith Community Services (ICS)

Pima County Community Action Agency offers competitive bids to qualified non-profit organizations to carry out Community Action programs supported by CSBG funds. Generally, 10 to 13 Community Action contracts are awarded throughout the agency service area each year. These organizations leverage community resources with local partnerships to make the most of their CSBG funding. The following narrative describes one of those programs carried out by a faith-based community partner:

Even in this time of economic downturn, ICS is financially stable. ICS has made a number of reductions in the budget without affecting services to date. The Board of Directors and volunteer Finance Committee of experienced financial professionals carefully watch cash flow and funding. ICS has had the ability to raise and leverage private dollars effectively. The umbrella of services allows the case managers to refer a client for other services at the time of their initial interview, increasing the chance of success for the client’s goal of self-sufficiency. More than 600 dedicated volunteers represent a major resource to all the ICS programs and keep operating costs low.

The outcome indicator used during the case management of the client was the Self-Sufficiency Matrix developed by the Arizona Community Action Network. During the follow-up interview and after one month from the initial case management interview, another assessment was made using the matrix. ICS
assisted 118 clients with CSBG funding in FY 2013. While many were still seeking employment, approximately 60 percent showed forward movement on the matrix.

In SFY 2014, Interfaith Community Services partnered with Arizona Youth Partnership to assist clients with tools for sustainability. ICS’s financial assistance program provided funding for emergency needs and barriers to obtaining employment. A portion of these funds came from the CSBG grant. ICS’s Job Resource Center provided services in the areas of resume writing, job search, career planning, and financial literacy.

ICS’s financial assistance program provided funding for emergency needs and barriers to obtaining employment. Some of these funds came from the CSBG grant. ICS’s Job Resource Center provided services in the areas of resume writing, job search, career planning, and financial literacy.

Forty clients received CSBG emergency rental assistance. Meanwhile, Arizona Youth Partnership’s Strengthening Families Programs concentrated on family relationships, parenting skills, improving youth social and life skills, and couple communication skills. Twelve families completed the Strengthening Families Program. This collaboration considered all aspects of each families’ needs to reach stability and sustain them beyond basic assistance.

**SFY 2015 update**: The last few years have demonstrated two primary issues faced by the majority of program participants in need of financial assistance: unemployment or underemployment, or health issues. Pima County’s partner agency, ICS, works to eliminate some of the barriers to sustainable employment for its clients. The agency assists clients with applying for medical coverage and find solutions to obtain medication assistance with its Health Advocacy program.

To respond to the increased numbers of unemployed individuals and families facing financial challenges, ICS launched partnerships with Pima County One Stop, Wells Fargo Foundation, United Way, and Arizona Youth Partnership (AZYP), to provide One Stop employment assistance, help with public assistance applications, prepare free federal & state tax returns, and help clients learn how to save and better manage their finances. Plus AZYP provided family relationship workshops which helped with family communication and parenting skills.

The outcome indicator used during the case management of the client was the Self-Sufficiency Matrix used by Pima County Community Action Agency. During the follow-up interview after one month from initial case management interview another assessment was made using the matrix. ICS assisted 123 clients with CSBG funding in FY 2015 and approximately 60 percent showed forward movement on the Matrix.

ICS’s financial assistance program provided funding for emergency needs and barriers to obtaining employment. Some of these funds came from the CSBG grant. ICS’s Job Resource Center provided services in the areas of resume writing, job search, career planning, and financial literacy.

Forty Clients received CSBG funding in SFY 2015 for job related barriers, gas vouchers, monthly bus passes, AZ I.D.’s, car repairs, clothing requirements, tools, required classes, etc. Sixty-four clients received CSBG emergency funding for rent or mortgage assistance.

Meanwhile, Arizona Youth Partnership’s Strengthening Families Programs continues to concentrate on family relationships, parenting skills, improving youth social and life skills, and couple communication skills. The couples communication workshop is one day and the family program is once per week for eight
weeks. This collaboration considered all aspects of the families’ needs to reach stability and sustain it, moving beyond what the families originally requested in basic direct assistance.

**Mesa Community Action Network (Mesa CAN)**

In Fiscal year 2015, Mesa CAN launched a Financial Opportunity Center Model and named it the Personal Investment Center (PIC). Using this model, Mesa CAN has changed the way clients receive service, and ensures that they receive multiple services. For returning clients (those that have received financial assistance from Mesa CAN at any time in the past), Mesa CAN instituted an orientation session called “PIC Your Path Plan”. These clients now call or walk in to receive an orientation slot. Mesa CAN conducted orientations twice weekly during the busy summer months, and once weekly during the fall and winter months. At the orientations, clients choose their path and are referred to a coach in the area chosen. This has dramatically changed access to services primarily for those that are new to Mesa CAN.

In prior fiscal years, Mesa CAN staff also began to study some of the gaps in services based on need for our regular clients. The agency began reviewing files of clients that had been requesting assistance for multiple years. In addition, the agency looked at new client files and the gaps in client ability to become and remain self-sufficient. The agency discussed what clients had been saying in their case management interviews. The agency identified three gaps for families working towards self-sufficiency:

1. Lack of employment—also included underemployment.
2. Lack of Education or proper employment certification and
3. Lack of or poor household fiscal management

Mesa CAN engaged with two main community partners—Goodwill Employment Services and Mesa Community College (MCC). The agency focused on making these partnerships stronger in SFY 2015. Mesa CAN asked these partners to help expand services for clients by creating a physical presence in Mesa CAN’s building, effectively making Mesa CAN more of a “one stop shop” for all populations served. Beginning FY 2015, these partners provided direct services to clients who attended orientation in the Mesa CAN facility.

CSBG funds were used in the agency’s Community Action Program budget as a line item for the Client Services Program. These operating funds were used to assist with the administrative costs of enrollment, case management, and implementation of the program.

**Western Arizona Council of Governments (WACOG)**

WACOG has been dedicated to the health and well-being of the communities and families served since 1971. WACOG Community Services covers a three-county service area that consists of La Paz, Mohave, and Yuma counties. WACOG provides a comprehensive array of services to help people achieve their highest level of self-sufficiency. Services and programs reach a diverse population of residents from preschool children participating in Head Start programs to older adults attending senior center activities. The Community Action Program (CAP) was established to mobilize resources to help families move toward self-sufficiency and out of poverty.

WACOG programs provide a comprehensive “safety net” of services to the community, working to prevent homelessness, maintaining independent living, and providing the foundation for the development of self-sufficient, healthy, caring, and productive children and families. The organization’s services extend a helping hand to residents in times of crisis or need.
A Hand Up, WACOG’s housing counseling program was initiated in 2010. This program has steadily increased capacity and scope by assisting homeowners in maintaining their primary asset, providing income management education and coordinating with emergency service case management systems, instituting Workforce Development and Weatherization programs to target and bundle services for low income homeowners with priority for elderly clients and families with children and those seeking employment, training and education.

For SFY 2014, the A Hand Up program provided 36 Financial Education Workshops, six “Pre-Purchase Counseling” workshops assisting 148 households with Foreclosure Prevention Counseling. The VISTA initiative by end of year three is expected to build the capacity of WACOG and Western Arizona Community Alliance to mobilize and coordinate service through WACOG’s service integration work with Workforce Investment and extend this integration to other community non-profit services providers.

In April 2014, WACOG partnered with Western Arizona Community Alliance and implemented Volunteers in Service to America (VISTA) Pathways out of Poverty Initiative. The VISTA Pathways Out of Poverty grant initiative is a three year program which builds upon WACOG’s program capacities to deliver high impact solutions in an integrated and holistic fashion. Homeowners are, in addition to receiving emergency assistance, referred to the Housing Counseling and Weatherization programs for income management, housing counseling, education, and linked to other resources which support a long-term plan for self-sufficiency. All intakes are triaged for homeownership then referred to Housing Counselors for education and counseling assistance as well as Weatherization.

WACOG is one of three Community Action Agencies in the State to become a HUD certified Housing Counseling Agency. The expertise of the staff who are trained as Housing Counselors, provides opportunities to build upon internal capacities and integrate/coordinate with case managers to bundle services and provide a more holistic service to the clients who come through the doors. The AmeriCorps VISTA grant provides an opportunity to innovate and try new approaches without sacrificing the financial capital since it provides the human capital through a stipend paid by this federal source. Community Partners include Churches and Senior Centers who assist clients in accessing utility assistance. For the VISTA project, Yuma Private Industry Council is a full partner in service integration with Workforce project and provides staff, facilities and materials as needed.

CSBG funds are used to support the staff delivering the service, supplies, and materials needed by WACOG and partners, to operate the programs.

WACOG’s Weatherization and Major Home Rehabilitation Program targets vulnerable populations including seniors. The Program provides long-term improvements to living conditions, allowing the retention of an asset and provides added income, which, for low-income seniors, often means deciding between utilities and medication. Local vendors and home supply companies provide materials and supplies while general and specialty contractors provide for the installation of energy efficient measures. Local Workforce Investment programs provide candidates for job training beside the WACOG experienced Weatherization staff. In SFY 2013, 150 homes whose occupants included at least one senior were weatherized or rehabilitated. CSBG funding covers staff activities in the delivery of services in the Weatherization and Major Home Rehabilitation Program. CSBG provides, in part, the administrative and operational capacity to deliver these services.
Special Project: Gila County Community Services

Canal Park Senior Apartments Emergency Services Special Project. Approximately 70 senior and/or disabled residents became homeless in SFY 2015 due to major flood damage resulting from a fire in their apartment complex in Payson, Arizona. The units were uninhabitable for 40 days, and Gila county Community Action and Housing applied to DES for CSBG Discretionary Emergency funds to meet the temporary housing needs of these residents until their homes were repaired.

Gila County Community Action and Housing was able to coordinate a community-wide response, as the emergency was widely reported in the media. The City of Payson joined in partnership to provide shelter, food, clothing, medication, counseling, and support. The Salvation Army provided $30,000 for motel stays. Gila County provided $10,000 for additional motel and food expenses. The Red Cross provided counseling. The Payson Senior Center coordinated the efforts of businesses, local charities, and other organizations to provide assistance. The Red Cross also provided transportation, food, and counseling at the beginning of the crisis. Various restaurants provided vouchers for meals. The Payson Senior Circle delivered and served food. Local animal welfare agencies and volunteers assisted in temporarily housing the resident’s pets that could not be accommodated by the hotels.

There were approximately 70 displaced residents. Several of these residents had life-threatening conditions. One of the residents died due to the extreme duress of complications resulting from suddenly becoming homeless. The displaced residents were able to stay in a comfortable and safe environment while extensive repairs were made to the apartment building. The many local partners worked hard to minimize the disruption to the lives of the residents as much as possible. The residents were unable to retrieve their belongings as the City had declared the building hazardous until repairs were made. The surviving residents received housing, medications, food, clothing and counseling.

Gila County Community Action and Housing received a CSBG Discretionary award to contribute $10,000 for housing and food for the displaced residents when the coordinated agencies and organizations had exhausted all available funds and were unable to provide any further assistance. The damage was worse than original estimates, and the duration of the repairs extended longer than anticipated. The CSBG Discretionary funding was used to continue the temporary shelter and food until the residents could return to their homes. Without the CSBG funding, the 70 residents would have been homeless and hungry and more lives may have been lost.
# Scope of Work

Community Action Program Services

1.0 ADES Mission and Vision Statement

1.1 **ADES Mission** – The Arizona Department of Economic Security (ADES) promotes the safety, well-being, and self-sufficiency of children, adults, and families.

1.2 **ADES Vision** – Every child, adult, and family in the state of Arizona will be safe and economically secure.

2.0 Purpose

2.1 **Purpose Statement** – This contract provides broad-ranging programs and services in rural and urban areas that are intended to pursue the reduction of poverty, the revitalization of low-income communities and the empowerment of low-income families and individuals to become fully self-sufficient.

2.2 **Legal Authority** – Pursuant to Arizona Revised Statutes (A.R.S.) Section §41-1954 (A)(6) provides the Department the authority to contract and incur obligations within the general scope of its activities and operations subject to the availability of funds, and A.R.S. Section §41-1954 (A)(8), to make funding available to provide an array of services for the reduction of poverty, the revitalization of low-income communities and the empowerment of low-income families to become fully self-sufficient.

2.3 **Funding** – Fund sources that support the services include the Community Services Block Grant (CSBG), Temporary Assistance to Needy Families (TANF), Social Services Block Grant (SSBG), Low Income Home Energy Assistance Program (LIHEAP), and Neighbors Helping Neighbors (NHN). The use of the funding may be directed by statute or prescribed by federal requirements. Funding information is summarized below.

<table>
<thead>
<tr>
<th>FUND SOURCE</th>
<th>ALLOWABLE ACTIVITIES</th>
<th>ADDITIONAL INFORMATION</th>
</tr>
</thead>
</table>
| Community Services Block Grant (CSBG) – Federal | Activities that are designed to assist low-income families and individuals to remove obstacles and solve problems that block the achievement of self-sufficiency, to secure and retain meaningful employment, attain adequate education, make better use of available income, obtain and maintain adequate housing, obtain emergency assistance, achieve greater participation from low-income communities, establish partnerships and strengthen relationships with community organizations, establish youth development programs, create linkages to fill gaps in services, and support innovative community and neighborhood based initiatives. | Various objectives may include providing case management services to individuals and families in securing services from other agencies, or moving a family from crisis situations onto various stages of self-sufficiency. Funds are distributed to designated Community Action Agencies (CAAs) according to a funding formula that consists of the following elements:

1. Number of persons in poverty in the geographic area served.
2. Number of persons unemployed in the geographic area served.
3. Five percent of the overall funds is distributed only to rural counties.
4. Funds are adjusted for tribes receiving CSBG dollars.

Any Contractor whose allocation does not reach a minimum of $150,000 will receive an allocation of at least $150,000. The Limited Purpose Contractor serving Migrant or Seasonal Farm Workers will receive two percent of the overall available CSBG funds. |
| Temporary Assistance to Needy Families (TANF) – Federal | Case management services, emergency shelter, move-in assistance, eviction prevention, and utility assistance | Funds are distributed to designated CAAs according to a funding formula that consists of the following elements:

1. Number of persons in poverty in the geographic area served.
2. Five percent of the overall funds is distributed only to rural counties.

Any Contractor whose allocation does not reach a minimum of $150,000 will receive an allocation of at least $150,000. The Limited Purpose Contractor serving Migrant or Seasonal Farm Workers will receive two percent of the overall available TANF funds. |
<table>
<thead>
<tr>
<th>FUND SOURCE</th>
<th>ALLOWABLE ACTIVITIES</th>
<th>ADDITIONAL INFORMATION</th>
</tr>
</thead>
<tbody>
<tr>
<td>Social Services Block Grant - Locally Planned (SSBG-LP) Federal</td>
<td>Contractor operations, case management, general transportation, and supportive services, for individuals and families.</td>
<td>Funding amounts are determined through the local planning process of Councils of Governments (COGs) - for General Transportation in Coconino, Yavapai, and Navajo Counties.</td>
</tr>
<tr>
<td>Low Income Home Energy Assistance Program (LIHEAP) Federal</td>
<td>Utility Assistance</td>
<td>Funds are distributed to designated CAAs and designated LIHEAP contractors according to a funding formula that consists of the following elements: (1) Number of persons in poverty in the geographic area served. (2) Number of persons unemployed in the geographic area served. (3) Five percent of the overall funds are distributed only to rural counties.</td>
</tr>
<tr>
<td>Neighbors Helping Neighbors (NHN) Local</td>
<td>Utility Assistance</td>
<td>Funds are distributed to designated CAAs and designated NHN according to a funding formula that consists of the following elements: (1) Number of persons in poverty in the geographic area served. (2) Number of persons unemployed in the geographic area served. (3) Five percent of the overall funds is distributed only to rural counties.</td>
</tr>
</tbody>
</table>

2.4 Definitions – See Exhibit A, as may be amended.

3.0 Program Description

3.1 Community Services (provided in every county in Arizona) – The primary objectives of this service are to strengthen community capabilities for planning and coordinating the use of a broad range of resources related to the elimination of poverty; the organization of a range of services so that these services may have a measurable and potentially major impact on the causes of poverty and help families and individuals become self-sufficient; the greater use of innovative and effective community based approaches to attacking the causes of poverty and of community breakdown; the maximum participation of the poor to empower them to respond to the unique problems and needs within their communities; and the broadening of the resource base of programs directed to the elimination of poverty.

3.2 Case Management (provided in every county in Arizona) – This service provides assistance to low-income families and individuals by providing case management services that are intended to assist the household in resolving crisis situations and move closer to self-sufficiency. Components of this service include Short Term Crisis Services, Utility Assistance Services, and any other program or service the Contractor deems necessary and appropriate, according to local community needs and priorities.

3.3 General Transportation (provided in Coconino, Navajo and Yavapai Counties only) – This service provides or assists in obtaining various types of transportation for specific needs. This service may include various types of transportation for employment, medical, training, or other supportive services with the exception of ambulance services. It may be provided by Contractor-operated vehicles or through vouchers for public transit.

4.0 Notices

4.1 The Contractor shall address all correspondence regarding this contract to:

Arizona Department of Economic Security
DAAS Contracts Unit
P. O. Box 6123-Site Code 950A
Phoenix, AZ 85005-6123
4.2 The Department will address all correspondence regarding this contract to the individual(s) identified in the letter of assurances (Attachment 9).

5.0 Reserve

6.0 Administrative Requirements – The Contractor shall:
6.1 Provide services that are culturally relevant and linguistically appropriate to the population served.
6.2 Comply with ADES Policy and Procedure Manuals as may be amended, and all applicable federal, state, and local laws, rules, and regulations as may be amended, including but not limited to the following:
   6.2.1 COATES Human Services Reauthorization Act of 1998
   6.2.2 Personal Responsibility and Work Opportunity Reconciliation Act of 1996
   6.2.3 Stewart B. McKinney Homeless Assistance Act
   6.2.4 ARS §46-241 - Short Term Crisis Services
   6.2.5 ARS §46-701 - Utility Assistance
   6.2.6 ARS §46-741 - Neighbors Helping Neighbors
   6.2.7 ARS §46-140.01 - Verification of identity and citizenship and/or immigration status; and ARS §§1-501-1-502, regarding eligibility for federal and state or local public benefits.

6.3 Staffing and Security
6.3.1 Verify and assure that staff members and volunteers conflicts do not have conflicts of interest of in the provision of services and management of the programs.
6.3.2 Provide to all staff and volunteers timely and accurate information and appropriate training for the services they provide.
6.3.3 Maintain client/recipient confidential information in a secure location.

6.4 Equipment
6.4.1 Communicate with ADES electronically through email to convey Microsoft-based text and spreadsheet documentation, and access/utilize up-to-date information from ADES, U.S. Department of Health and Human Services (DHHS) Office of Community Services (OCS), and other web sites.
6.4.2 Utilize computer backup/recovery systems and procedures to ensure no loss of data required for ADES reports, and to ensure that there is no disruption or degradation of services provided.
6.4.3 Utilize a computer-based tracking system from which monthly, quarterly, and other reports may be generated.
6.4.4 Upon notification from ADES, directly input financial data into the DAAS Reporting System (DAARS) in accordance with system guides, as may be amended.
6.4.5 Upon notification from ADES, directly extract programmatic and financial reports from DAARS to monitor service delivery and financial expenditures.

6.5 Service Provision
6.5.1 Provide services directly, as allowed, or through subcontractors.
6.5.2 Collect and report required client data.
6.5.3 Maintain documentation that key staff has received appropriate training or hold appropriate certification/licensure in accordance with their job descriptions.
6.5.4 Maintain documentation that appropriate case management staff has received training on the requirements of ARS §46-140.01 and ARS §1-501 and 1-502 regarding eligibility for State and local benefits (this does not apply to tribal entities).
6.5.5 Maintain and utilize a policy and procedure manual that includes, at a minimum, detailed intake procedures, program description and eligibility requirements, client grievance procedures, non-discrimination policy, and confidentiality requirements.
6.5.6 Maintain client-focused facility locations which offer sufficient client waiting space or waiting rooms, adequate seating, and restrooms for program applicants at all permanent facility locations indicated on the Facility Location Chart (Attachment 1).

6.6 Networking
6.6.1 Develop partnerships and network with related programs to provide more immediate resolution to issues and expand resources.
6.6.2 Form local partnerships with community agencies to address the needs of low-income families and individuals.
6.6.3 Network with social service professionals within the community to expand their means to receive and disseminate information for each service.

6.6.4 Facilitate and participate in education, training, and information seminars, workshops, and conferences.

6.6.5 Participate in conference calls and attend meetings initiated by ADES to receive training or obtain information.

6.7 Subcontract Related Service Provisions

6.7.1 Document all costs associated with provision of contract services.

6.7.2 Provide administrative assistance, training and technical assistance to subcontractors in support of administrative functions as needed or requested by subcontractors.

6.7.3 Require that subcontractors are in compliance with applicable administrative directives and forms.

6.7.4 Provide technical assistance to subcontractors through procedural interpretation or by additional research upon request.

6.7.5 Develop and present initial and refresher training to subcontractor staff as deemed necessary by the Contractor, subcontractor or ADES.

6.7.6 Implement a coordinated service delivery system that establishes standards for service delivery and operations.

6.7.7 Hold periodic meetings with subcontractors to communicate new developments, discuss problems, share ideas for improvements and address other identified topic areas.

6.7.8 Utilize client grievance procedures, which respond timely and effectively to customer complaints.

6.7.9 Develop linkages between the coordinated service delivery system and other community resources.

6.7.10 Identify service gaps among client populations and develop and implement services or resources to meet identified needs.

6.7.11 Address client barriers to service.

6.7.12 Train appropriate personnel in the use and completion of the ADES EN-005 Application for Services form(s) or other ADES approved written or electronic form(s) as may be amended (Exhibit B).

6.8 Monitoring and Evaluation

6.8.1 Utilize instruments for monitoring/evaluating subcontractors' performance and compliance with Administrative Requirements stated in Section 6.0, as well as other requirements specified in service scopes of work.

6.8.2 Conduct at a minimum, on-site contract compliance monitoring of subcontractors at least every two years, to include, but not limited to, facilities, administrative and financial operations, and programmatic service delivery.

6.8.3 Establish and implement a process for service/performance improvement.

6.8.4 Participate in ADES evaluation studies, when required.

6.9 CSBG Organizational Standards

6.9.1 Participate in the implementation of the CSBG Organizational Standards and any training made available to assist with the implementation and compliance with the Standards as recommended by OCS and agreed to by CAAs and ADES, as may be amended (CAAs only).

7.0 General Reporting Requirements – The Contractor shall:

7.1 Submit the following items and all correspondence to:

Arizona Department of Economic Security
DAAS Contracts Unit
P. O. Box 6123-Site Code 950A
Phoenix, AZ 85005-6123

7.1.1 A complete and accurate monthly Contractor's Invoice and Statement of Expenditures. Until such time as the Division of Aging and Adult Reporting System (DAARS) allows and requires contractors to enter expenditure information directly in the system. Note: Mileage will be reimbursed at no greater than the current federal mileage reimbursement rate. Exceptions may be requested in writing to, and considered for approval by, the Community Services Program Administrator.

7.1.2 Updated Cost Allocation Plan by October 1, 2015, if not provided prior to contract start date.

7.1.3 A correctly completed "Contractor's Equipment List" (Form FES-1000A), as may be amended, for all proposed equipment purchases costing $5,000 or more to be purchased in whole or in part with ADES funds (Exhibit C).
7.1.4 Contractor’s insurance certifications identified in the ADES Special Terms and Conditions, Insurance Requirements section.

7.1.5 Subcontractor’s insurance certifications identified in the ADES Special Terms and Conditions, Insurance Requirements section.

7.1.6 By June 30 annually, a twelve month monitoring plan that includes at a minimum: which direct service subcontractors are to be monitored during the twelve month period beginning July 1 (of the same year), and for each: administrative, fiscal, and/or programmatic the specific service(s) to be monitored, and the target monitoring start and completion dates.

7.1.7 Programmatic reports as specified under each service (i.e., Community Services, Case Management, and General Transportation).

8.0 Items Provided by the Department – The Department shall provide:

8.1 Funding allocation information, as needed.

8.2 A Contractor’s Invoice and Statement of Expenditures form.

8.2.1 Training on direct input of expenditure information into DAARS prior to functional implementation.

9.0 Community Services

9.1 Service Description

9.1.1 Services that provide a range of activities that have a measurable and major impact on the causes of poverty.

9.2 Service Information

9.2.1 The purposes of the CSBG are to provide assistance to local communities through a network of CAAs that pursue six national goals outlined in federal law:
1. Low-income people become more self-sufficient
2. The conditions in which low-income people live are improved
3. Low-income people own a stake in their community
4. Partnerships among supporters and providers of services to low-income people are achieved
5. Agencies increase their capacity to achieve results
6. Low-income people, especially vulnerable populations, achieve their potential by strengthening family and other supportive environments

9.2.2 These goals will be accomplished through activities that:
1. strengthen community capabilities for planning and coordinating the use of a broad range of resources related to the elimination of poverty, in a manner responsive to local needs and conditions;
2. organize a range of services so that these services may have a measurable and potentially major impact on the causes of poverty and help families and individuals become self-sufficient;
3. coordinate the greater use of innovative and effective community-based approaches to attacking the causes of poverty and of community breakdown;
4. seek maximum feasible participation of low-income residents to empower them to respond to the unique problems and needs within their communities; and
5. broaden the resource base of programs directed to the elimination of poverty.

9.3 Board Requirements – The Contractor shall:

9.3.1 Private, non-profit CAAs:
1. Select a Tripartite Governing Board that administers the services.
2. Seat a Tripartite Governing Board that is comprised as follows:
   (i) One-third are elected public officials, holding public office on the date of selection.
   (ii) Not fewer than one-third of members are persons chosen in accordance with democratic selection procedures adequate to ensure 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.
   (iii) The remaining members are officials or members of business, industry, labor, religious, law enforcement, education, or other major groups and interests in the community served.
3. Establish and follow written procedures identified in CSBG legislation to ensure the Tripartite Governing Board membership that conforms to the Tripartite Board requirements, including a description of the democratic selection process used in the appointment of members.
4. Establish and follow written procedures including board by-laws, to ensure the Tripartite Governing Board fully participates in the development, planning, implementation, and evaluation of the program and services to serve low-income communities, including but not limited to:
   (i) active participation in the development and on-going implementation and evaluation of the Contractor Community Action Plan;
   (ii) active participation in ensuring the completion of a Community Needs Assessment for the area served, and in reviewing the results of the Assessment to ensure responsiveness to any identified gaps in services; and
   (iii) active participation in the identification and evaluation of Result Oriented Management and Accountability (ROMA) Performance Outcomes used in measuring the Contractor's effectiveness in achieving the six national goals.
5. Establish and follow written procedures that describe how a low-income individual, community organization, religious organization, a representative of low-income individuals that considers its organization and low-income individuals to be inadequately represented on the board, petition for adequate representation on the Board.
6. Conduct a minimum of four quarterly Tripartite Governing Board meetings per state fiscal year.
   a. For public and quasi-governmental entities, meetings must conform to Arizona open meeting laws.
7. Maintain records of Tripartite Governing Board membership, election and selection process, and detailed meeting minutes.
8. Provide upon request and maintain documentation demonstrating Tripartite Governing Board members' training, including, but not limited to board member governance and advisory responsibilities, the purposes of the CSBG and other programs administered by the Contractor, and the requirement of the Board to participate in the ROMA System.
9. Maintain and provide, upon request, documentation of the democratic selection process utilized for low-income representatives.
10. Document and communicate to ADES efforts to fill any vacancies.
11. Address any vacancies within 90 days of each occurrence; provide upon request and maintain documentation of efforts to fill within 120 days of occurrence.

9.3.2 Public CAAs Advisory Board:
1. Select members to serve on a Board in which one-third of the board members are persons chosen in accordance with democratic selection procedures adequate to assure that these members are representative of low-income individuals and families. Select representatives to fill balance of seats as set forth in governing documents.
2. Maintain and provide, upon request, documentation of democratic selection process for low-income representatives.
3. Document and communicate to ADES efforts to fill any vacancies.
4. Address any vacancies within 90 days of each occurrence and provide and maintain documentation of efforts to fill within 120 days.

9.4 Community Action Plan Requirements – The Contractor shall:
9.4.1 Develop, and implement when approved by ADES, a Community Action Plan that includes:
1. a description of a needs assessment for the community served, that may be coordinated with community-needs assessments conducted for other programs;
2. contractors' objectives that are aligned with the six (6) national goals;
3. a description of the Contractor that includes its primary functions, responsibilities, organizational structure, and its association as part of a larger entity if appropriate;
4. a description of the service delivery system for services provided or coordinated with CSBG funds.
5. a narrative that demonstrates how the results of the Community Needs Assessment were used and incorporated into the Community Action Plan;
6. a description of how linkages will be developed to fills gaps in services through the provision of information, referrals, case management, and follow-up consultations;
7. a description of how CSBG funds will be coordinated with other public or private resources;
8. a description of how the Contractor will use CSBG funds to support innovative community and neighborhood based initiatives;
9. a description of how the Contractor will provide, on an emergency basis, for the provisions 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;
10. a description of how the Contractor will, to the maximum extent possible, coordinate programs and form partnerships with other agencies serving low-income residents, including religious organizations, charitable groups, and community-based organizations; and

11. a description of the ROMA performance outcomes and any related indicators that will be used to measure the Contractor's performance in achieving the six (6) CSBG national goals.

9.5 Results Oriented Management & Accountability (ROMA) Requirements – The Contractor shall:

9.5.1 Participate in the ROMA System as may be amended, for measuring performance and results of programs and services.

9.6 Program Reporting Requirements – The Contractor shall:

9.6.1 Submit the following items as may be amended, by the dates indicated, as may be amended, by the ADES Community Services Program Administrator through written notification to the Contractor:

1. Annual Community Action Plan with a description of the Needs Assessment conducted for the community served, by June 30th of each calendar year. Contractor must utilize format specified by ADES (Exhibit D).

2. Quarterly ROMA Outcomes Report (Exhibit E) by October 25, January 25, April 25 of each calendar year. The Contractor shall not submit a Fourth Quarter Report, but shall include fourth quarter data with the Annual CSBG IS Report. Contractor must utilize format specified by ADES (Exhibit F).

3. CSBG Information System (IS) Report by October 1st of each calendar year (Exhibit F).

4. Schedule of planned Board meetings for the next twelve months, by June 30 of each calendar year.

5. Monthly Community Services Block Grant (CSBG) Contract Payment Verification Form (All CAAs), as appropriate (Exhibit G).

6. Copy of complete and detailed minutes from Tripartite/Advisory Board meetings within 30 days of the meeting date.

7. Current Organizational Chart by June 30 of each year.


9.7 Items Provided by the Department – The Department shall provide:

9.7.1 Formats for Annual Community Action Plan, Quarterly ROMA Outcomes Reports, and CSBG Final Reports.

9.7.2 Training on Community Action Plan preparation, Quarterly ROMA Outcomes Report preparation, and CSBG Final Reports.

10.0 Case Management

10.1 Service Description

10.1.1 A service or process that establishes a relationship with an individual or family in order to enhance their functioning and/or integration into the community. Appropriate services and/or benefits are identified, planned, obtained, provided, recorded, monitored, modified when necessary and/or terminated. This may include: assessment to determine their needs and eligibility when applying for/receiving services, assistance in finding necessary resources in addition to covered services to meet basic needs, assistance in obtaining entitlements, communication and coordination of care as well as follow-up of crisis contact or missed appointments.

10.1.2 This service specifically provides assistance to low-income families and individuals by providing case management services that are intended to assist the household in resolving crisis situations and move closer to self-sufficiency. Components of this service include Short Term Crisis Services, Utility Assistance Services, and any other program or service the Contractor deems necessary and appropriate, according to local community needs and priorities.

10.2 Service Information

10.2.1 The primary goal of this service is to assist low-income individuals and families in resolving crisis situations, and moving households closer to self-sufficiency.

10.2.2 All CAAs shall provide the following:

1. Case Management.

2. Short Term Crisis Services (STCS) that provide temporary assistance to persons at or below 125 percent of poverty, or 150 percent if elderly or disabled, who have an emergent need that cannot be met immediately with their own income or other resources. The STCS program is funded with TANF and is available to low-income families with children. Benefits available through the STCS program include the following:
10.2.3 All CAAs and designated LIHEAP agencies shall provide the following:

1. Utility Assistance Services that assist low-income households lower basic home energy bills with specific emphasis on those households with the lowest income and highest energy burden and that respond to problems related to the termination of heating and/or cooling. Utility Assistance is funded with Low Income Home Energy Assistance Program (LIHEAP), and Neighbors Helping Neighbors (NHN) funds. For LIHEAP eligibility, the household income limit is sixty (60) percent of the State Median Income (SMI) or 150 percent of the Federal Poverty Guideline (FPG), whichever is greater, as may be amended. For NHN eligibility, the household income limit is 125 percent of the FPG except for individuals sixty years of age or older or disabled, where the household income limit is 150 percent of the FPG, as may be amended. The Contractor shall offer Utility Assistance Services as a component program under the overall Case Management Service structure. Benefits include:
   (i) Utility payments or deposits for heating and cooling
   (ii) Temporary emergency shelter (if needed due to energy related crisis)
   (iii) Payment of water bills related to cooling (May 1 through October 1)
   (iv) Rental assistance where utility payment is included in the rent

10.2.4 Tribal entities shall provide utility assistance funded with LIHEAP. Benefits include the following:
1. Utility payments or deposits for heating and cooling
2. Payment of water bills related to cooling (May 1 through October 1)
3. Rental assistance where utility payment is included in the rent

10.3 Case Management Requirements (CAAs and designated LIHEAP agencies) – The Contractor shall:

10.3.1 Develop and implement client oriented intake procedures which are responsive to households in crisis situations.

10.3.2 Develop and implement intake procedures responsive to applicants who are physically infirm and must apply for benefits without leaving their homes.

10.3.3 Develop in collaboration with the client, a case management plan that includes the following:
   1. An assessment of the client’s resources and needs
   2. Specific objectives that relate to the goal of alleviating any immediate crisis situation
   3. Eligibility for supportive services including but not limited to STCS and Utility Assistance, through direct provision or referral

10.3.4 Provide assessment of the household’s needs in order to establish a case plan if necessary, and arrange for the provision of services designed to:
   1. resolve any immediate crisis in a timely manner;
   2. assist the household in obtaining other benefits to which they may be eligible including but not limited to Home Weatherization, Appliance Repair or Replacement, Child Care, Earned Income Tax Credit, Supplemental Nutrition Assistance Program (SNAP), Social Security Benefits, and Utility Discount Programs; and
   3. arrange for training or counseling intended to remove obstacles and solve problems that block the achievement of self-sufficiency, including but not limited to financial literacy classes, budget counseling, energy conservation education, efforts intended to secure and maintain meaningful employment, attain an adequate education, obtain and maintain adequate housing and a suitable living environment, and to obtain emergency assistance to meet the immediate and urgent needs of the family or individual.

10.3.5 Complete a closing summary that includes, at a minimum, the services provided, the number and type of referrals made to alleviate the crisis situation.

10.3.6 Completion of the Self-Sufficiency Matrix, as may be amended located at: [insert link], for all case managed households in which a member of the household is eighteen (18) to fifty-nine (59) years of age, not disabled and not a full-time student, and is:
   a. unemployed and seeking earned income; or
   b. employed and seeking to reduce barriers to maintain earned income; or
   c. employed and seeking increased earned income and/or employment benefits; as may be amended.
10.3.7 Utilize report formats specified by ADES. All Contract Payment Verification Reports shall be submitted on a monthly basis with the Contractor’s monthly invoice. As appropriate, revised Case Management and Contract Payment Verification Reports shall be submitted with Supplemental Invoices.

10.4 **Short Term Crisis Services Requirements (CAAs only) – The Contractor shall:**
10.4.1 Follow all eligibility and procedural policies set forth in the ADES/DAAS Short Term Crisis Services Policy Manual and related Policy Clarifications or Revisions and as amended.
10.4.2 Use the ADES EN-005 Application or other ADES approved electronic or written Application for Services form(s) as may be amended, in determining program eligibility (Exhibit B). Application forms shall be uniform at all service locations within a designated service area.

10.5 **Utility Assistance Service Requirements (CAAs and designated LIHEAP agencies only) – The Contractor shall:**
10.5.1 Follow all eligibility and procedural policies set forth in the most current ADES LIHEAP Policy and Procedure Manual as may be amended. Keep and maintain the Manual with all related policy clarifications, additions or amendments. Contractor shall keep the most current version available to staff at all times.
10.5.2 Use the ADES EN-005 Application or other ADES approved electronic or written application for Services form(s) as may be amended, in determining program eligibility (Exhibit B). Application forms shall be uniform at all service locations within a designated service area.
10.5.3 The Contractor must demonstrate and exercise the ability to pay all vendors on behalf of an eligible client.
10.5.4 Utilize an in-house system to make payments to utility companies.

10.6 **Results Oriented Management & Accountability (ROMA) Requirements (CAAs only) – The Contractor shall:**
10.6.1 Participate in the Results Oriented Management and Accountability system for measuring performance and results of programs and services.
10.6.2 Participate in a statewide “ROMA Advisory Committee” to identify standardized performance indicators for the statewide Community Action Network.

10.7 **Program Reporting Requirements – The Contractor shall:**
10.7.1 Utilize and maintain a functional database system in which programmatic data shall be stored and reports submitted to ADES. An agreed upon data bridge from an existing data system may be utilized if a collective database system is used by Community Action Program Services contractors. All other reports such as, payment verification forms and narratives information shall be provided on the forms required by this contract, or as directed by ADES.
10.7.2 Submit the following reports as may be amended, for the timeframes indicated, as may be amended by the ADES Community Services Program Administrator through written notification to the Contractor:
1. Monthly Case Management Report by the 25th of each month (All CAAs and designated LIHEAP agencies) (Exhibit H1, H2).
2. Tribal LIHEAP Monthly Report (Tribal entity only) (Exhibit I).
3. Social Services Block Grant Annual Report (All CAAs and designated LIHEAP agencies) (Exhibit K) by August 31st of each calendar year.
4. Quarterly ROMA Outcomes Report (All CAAs) (Exhibit E).
5. Monthly Short Term Crisis Services (STCS) Contract Payment Verification Form (All CAAs) (Exhibit L).
6. Monthly Low Income Home Energy Assistance program Contract Payment Verification Form (All CAAs and designated LIHEAP Contractors) (Exhibit M).
7. Monthly Community Services Block Grant Contract Payment Verification Form (All CAAs), as appropriate (Exhibit G).
8. Monthly Neighbors Helping Neighbors Contract Payment Verification Form (All CAAs), as appropriate (Exhibit N).
9. LIHEAP Leveraging Report (Exhibit Q), annually by October 15.
10. LIHEAP Annual Household Report (Exhibit J, Estimated Report by August 15 and Final Report by October 15, as may be amended.
11. Where feasible and within appropriate timelines and resources, provide LIHEAP data as requested, until federal reporting requirements are finalized.
10.8 Items Provided by the Department – The Department shall provide:
10.8.1 The following report formats as may be amended by the ADES Community Action Program Administrator through written notification to the Contractor: Case Management Monthly Report, Annual SSBG Report, and Quarterly ROMA Performance Outcomes Reports.
10.8.2 Training on completing the Case Management Monthly Report, Quarterly ROMA Outcomes Report preparation, Short Term Crisis Services Program, and Low Income Home Energy Assistance Program.
10.8.3 Short Term Crisis Services Policy Manual, as may be amended.

11.0 General Transportation (Coconino, Yavapai and Navajo Counties only)
11.1 Service Description
11.1.1 This service provides or assists in obtaining various types of transportation for specific needs.
11.1.2 This service may include various types of transportation for employment, medical, training, or other supportive services, with the exception of ambulance services. Service to assist eligible individuals and households with mobility needs for various purposes such as employment, medical and/or training reasons when they do not have any other means of transportation is also included. Services may be provided using contractor-operated vehicles and/or through vouchers for public transit.

11.2 Service Information
11.2.1 The goal of this service is to provide or arrange for transportation for eligible individuals of all ages and abilities in order to access services or obtain medical care or employment, (e.g., medical appointments or employment-related training interviews). Case managers typically assist clients to access transportation to help increase or maintain client self-sufficiency.
11.2.2 Services in Coconino County are to assist elderly and/or persons with physical disabilities to remain as independent as possible.
11.2.3 Services in Yavapai County are to assist persons in accessing, employment, social services, medical and basic needs.
11.2.4 Services in Navajo County are to assist persons in accessing, employment, social services, medical and basic needs.

11.3 Service Requirements – The Contractor shall:
11.3.1 Contractors that transport clients:
1. Maintain valid license plates on vehicles used to transport clients.
2. Utilize vehicles that meet current federal, state and local safety and maintenance, standards, including vehicles for individuals with special needs, where applicable.
3. Maintain logs on all vehicles used for the transportation of clients.
4. Utilize paid and/or volunteer drivers that:
   (i) have no history of felony convictions;
   (ii) possess a valid State of Arizona Class D Operators Driver’s License for vehicles up to fifteen (15) passengers;
   (iii) possess a valid State of Arizona Class B Commercial Driver’s License with a passenger endorsement for vehicles over fifteen passengers, such as a bus;
   (iv) have a clean driving record with no suspensions within the past year;
   (v) are at least eighteen years of age; and
   (vi) pass a physical prior to providing transportation service to clients and pass a physical at least every two years.
5. Require volunteers who provide transportation to carry a Contractor/Company Identification Card.
6. Assist clients in entering and exiting the vehicle as needed.
7. Transport clients to scheduled appointments on time and safely.
8. Utilize vehicles that have seat belts for every occupant.
9. Require drivers to verify all occupants utilize seatbelts during transport.
10. Track the beginning and ending odometer readings of Contractors’ vehicles on days when used to transport clients, and identify the clients/households served on each date.

11.3.2 Contractors that arrange transportation for clients shall:
1. Make arrangements for client transportation through public or private providers.
2. Make transportation arrangements for clients to arrive at scheduled appointments on time and safely.
11.4 Program Reporting Requirements – The Contractor shall:
11.4.1 Submit the following report as may be amended, for the timeframes indicated as may be amended, by the ADES Community Services Program Administrator through written notification to the Contractor:
1. Monthly Transportation Report to include at a minimum: the number of clients served, the number of one-way trips (e.g., from client’s home to client’s work), total number of miles driven to transport clients, and results of any client satisfaction research.
Attachment 6.4a

DAAS/CAPS Policy Clarification

CSBG Organizational Standards Implementation and Assessment Policy and Procedure

In cooperation with the Community Action Network, DAAS/CAPS has drafted a proposed policy and procedure to evaluate the State policy and process for assessing CAA’s Compliance with Organizational Standards. See also Section 6.4a of the CSBG State Plan.

In SFYs 2017 and 2018

a. All eligible entities are expected to be in compliance with the CSBG Organizational Standards by the end of SFY 2018. As stated in the CSBG State Plans FFYs 2017-2018, in item 6.1, DAAS/CAPS has adopted all the CSBG Organizational Standards.

b. DAAS/CAPS will perform annual desk reviews of all eligible entities to assess current compliance/implementation status with the CSBG Organizational Standards. DAAS/CAPS will also provide a summary of required actions and documentation needed to demonstrate compliance within 30 days of the review.

c. For eligible entities scheduled for monitoring visits, DAAS/CAPS will discuss the results of desk reviews with eligible entities during the visits and follow up with a full summary of the review within 30 days after the visit (exhibit A). Eligible entities will have 30 days to respond.

d. For agencies with unmet standards, technical assistance will be provided and tracked in the agreed upon Organizational Standards Assessment Tool. A summary of the unmet standards is provided in the Report of Findings document, as applicable. Technical assistance will be available to eligible entities upon request on any of the Standards, regardless of compliance status, but will be required for unmet standards that are statutory and/or contract requirements.

1. The review cycle for each standard as stated in the Calendar of Required Actions (Exhibit B) will begin once a standard is determined to be met.

In SFYs 2019 and going forward

a. DAAS/CAPS will include formal assessment for compliance with Organizational Standards in the State On-site Monitoring Schedules beginning in SFY 2019.

b. All eligible entities will be reviewed annually for compliance with the applicable CSBG Organizational Standards either by desk review, or a scheduled on-site monitoring visit.

i. The prescribed timeframe for review of Standards listed in the “Calendar of Scheduled Actions” as “Maintain” or “As Needed/More Frequently than Annually,” will be every two years at monitoring visits, or annually if the standard is associated with a required annual process “Organizational Standards Status and Documentation Summary”, which contains the review cycle for each standard.
c. Standards listed in the Calendar of Required Actions to be reviewed at 3 or 5 year intervals, will be reviewed at the next onsite monitoring visit following the respective 3 or 5-year anniversary dates the last review.

d. DAAS/CAPS will notify eligible entities of when desk reviews will occur, prior to making any requests for information.

e. DAAS/CAPS will not request eligible entities to provide documents that are already on file. However, DAAS/CAPS will request references and/or citations that indicate specific dates or sections of documents where evidence of compliance is to be found, such as specific dates of meeting minutes, links to online information, or identification of relevant section of bylaws or policies. Eligible entities are encouraged to conduct self-assessments annually and will be requested to conduct self-assessments in preparation for on-site monitoring using the agreed upon assessment tool.

f. Formal and informal findings for Organizational Standards are as follows:
   
i. The State CSBG Office will not make formal findings regarding Organizational Standards that are not;
      a. Existing State, federal statutory or regulatory requirements, or
      b. State specified administrative or programmatic requirements in contract scope of work. The State CSBG Office will instead work with the agency to provide or secure on their behalf, any needed technical assistance to achieve compliance with any unmet Standards. TA will be provided for any unmet standards, as is required of the State. TA on standards will always be available upon request by the CAA. However it will be initiated by DAAS/CAPS for unmet standards.
      c. Unmet standards for which an eligible entity needs TA to achieve compliance will be noted as a Recommendation in the Report of Findings.
   
ii. When formal findings are noted DAAS/CAPS will indicate the item in the Report of Findings with a prescribed date for resolution.

NOTE: This policy applies only to the implementation and compliance with the CSBG Organizational Standards. All contractual, fiscal, programmatic, statutory, administrative and fiscal requirements that apply to DAAS/CAPS contracts will continue to be subject to findings and recommendations.

iii. Existing programmatic, contractual or statutory requirements that may, or may not, intersect with Organizational Standards, for CSBG or other contracted programs, will still be subject to formal findings.

Exhibit list –

A. Organizational Standards Status and Documentation Summary (template).

B. The Community Action Partnership Calendar of Required Actions, a checklist created by the Community Action Partnership that divides the Organizational Standards by frequency of required actions (ongoing, annually, every 2 years, etc.).
# Organizational Standards Status and Documentation

## Summary SFY 2018

<table>
<thead>
<tr>
<th>Category &amp; Standard</th>
<th>Documentation Requested</th>
<th>Review Cycle / Details / Remarks</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Category 1</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Consumer Input and Involvement</td>
<td>Reviewed: Annually or*</td>
<td></td>
</tr>
<tr>
<td>1.1</td>
<td></td>
<td><img src="false" alt=" " /></td>
</tr>
<tr>
<td>1.2</td>
<td>*Every 3 years</td>
<td><img src="false" alt=" " /></td>
</tr>
<tr>
<td>1.3</td>
<td></td>
<td><img src="false" alt=" " /></td>
</tr>
<tr>
<td><strong>Category 2</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Community Engagement</td>
<td>Reviewed: Annually or*</td>
<td></td>
</tr>
<tr>
<td>2.1</td>
<td>*2 years</td>
<td><img src="false" alt=" " /></td>
</tr>
<tr>
<td>2.2</td>
<td>*3 years</td>
<td><img src="false" alt=" " /></td>
</tr>
<tr>
<td>2.3</td>
<td></td>
<td><img src="false" alt=" " /></td>
</tr>
<tr>
<td>2.4</td>
<td></td>
<td><img src="false" alt=" " /></td>
</tr>
<tr>
<td><strong>Category 3</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Community Assessment</td>
<td>Reviewed: Every 3 Years</td>
<td></td>
</tr>
<tr>
<td>3.1</td>
<td></td>
<td><img src="false" alt=" " /></td>
</tr>
<tr>
<td>3.2</td>
<td></td>
<td><img src="false" alt=" " /></td>
</tr>
<tr>
<td>3.3</td>
<td></td>
<td><img src="false" alt=" " /></td>
</tr>
<tr>
<td>3.4</td>
<td></td>
<td><img src="false" alt=" " /></td>
</tr>
<tr>
<td>3.5</td>
<td></td>
<td><img src="false" alt=" " /></td>
</tr>
<tr>
<td><strong>Category 4</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mission and Direction</td>
<td>Reviewed: Varies</td>
<td></td>
</tr>
<tr>
<td>4.1</td>
<td>5 years</td>
<td><img src="false" alt=" " /></td>
</tr>
<tr>
<td>4.2</td>
<td>2 years</td>
<td><img src="false" alt=" " /></td>
</tr>
<tr>
<td>4.3</td>
<td>2 years</td>
<td><img src="false" alt=" " /></td>
</tr>
<tr>
<td>4.4</td>
<td>Annually</td>
<td><img src="false" alt=" " /></td>
</tr>
<tr>
<td>4.5</td>
<td>2 years</td>
<td><img src="false" alt=" " /></td>
</tr>
<tr>
<td>4.6</td>
<td>2 years</td>
<td><img src="false" alt=" " /></td>
</tr>
<tr>
<td><strong>Category 5</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Vision and Direction – Board Governance</td>
<td>Reviewed: Varies</td>
<td></td>
</tr>
<tr>
<td>5.1</td>
<td>2 years</td>
<td><img src="false" alt=" " /></td>
</tr>
<tr>
<td>5.2</td>
<td>2 years</td>
<td><img src="false" alt=" " /></td>
</tr>
<tr>
<td>5.3</td>
<td>5 years</td>
<td><img src="false" alt=" " /></td>
</tr>
<tr>
<td>5.4</td>
<td>2 years</td>
<td><img src="false" alt=" " /></td>
</tr>
<tr>
<td>5.5</td>
<td>Annually</td>
<td><img src="false" alt=" " /></td>
</tr>
<tr>
<td>5.6</td>
<td>2 years</td>
<td><img src="false" alt=" " /></td>
</tr>
<tr>
<td>5.7</td>
<td>Annually</td>
<td><img src="false" alt=" " /></td>
</tr>
<tr>
<td>5.8</td>
<td>2 years</td>
<td><img src="false" alt=" " /></td>
</tr>
<tr>
<td>5.9</td>
<td>Annually</td>
<td><img src="false" alt=" " /></td>
</tr>
<tr>
<td><strong>Category 6</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Vision and Direction – Strategic Planning</td>
<td>Reviewed every 5 years once implemented or*</td>
<td></td>
</tr>
<tr>
<td>6.1</td>
<td></td>
<td><img src="false" alt=" " /></td>
</tr>
<tr>
<td>6.2</td>
<td></td>
<td><img src="false" alt=" " /></td>
</tr>
<tr>
<td>6.3</td>
<td></td>
<td><img src="false" alt=" " /></td>
</tr>
<tr>
<td>6.4</td>
<td></td>
<td><img src="false" alt=" " /></td>
</tr>
<tr>
<td>6.5</td>
<td>*Annually once implemented</td>
<td><img src="false" alt=" " /></td>
</tr>
</tbody>
</table>

Documentation Sufficient = ✔
Documentation or Citation Needed = ❌
<table>
<thead>
<tr>
<th>Category &amp; Standard</th>
<th>Documentation Requested</th>
<th>Review Cycle / Details / Remarks</th>
</tr>
</thead>
<tbody>
<tr>
<td>Category 7</td>
<td>Operations and Accountability – Human Resource Management</td>
<td>Reviewed: Varies</td>
</tr>
<tr>
<td>7.1</td>
<td></td>
<td>5 years</td>
</tr>
<tr>
<td>7.2</td>
<td></td>
<td>2 years</td>
</tr>
<tr>
<td>7.3</td>
<td>RFA sufficient.</td>
<td>5 years -</td>
</tr>
<tr>
<td>7.4</td>
<td></td>
<td>Annually</td>
</tr>
<tr>
<td>7.5</td>
<td></td>
<td>Annually</td>
</tr>
<tr>
<td>7.6</td>
<td></td>
<td>2 years</td>
</tr>
<tr>
<td>7.7</td>
<td></td>
<td>2 years</td>
</tr>
<tr>
<td>7.8</td>
<td></td>
<td>2 years</td>
</tr>
<tr>
<td>7.9</td>
<td></td>
<td>2 years</td>
</tr>
<tr>
<td>Category 8</td>
<td>Operations and Accountability – Financial Operations and Oversight</td>
<td>Reviewed: Annually or*</td>
</tr>
<tr>
<td>8.1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>8.2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>8.3</td>
<td></td>
<td></td>
</tr>
<tr>
<td>8.4</td>
<td></td>
<td></td>
</tr>
<tr>
<td>8.5</td>
<td></td>
<td>*5 years</td>
</tr>
<tr>
<td>8.6</td>
<td></td>
<td></td>
</tr>
<tr>
<td>8.7</td>
<td></td>
<td></td>
</tr>
<tr>
<td>8.8</td>
<td></td>
<td></td>
</tr>
<tr>
<td>8.9</td>
<td></td>
<td></td>
</tr>
<tr>
<td>8.10</td>
<td></td>
<td></td>
</tr>
<tr>
<td>8.11</td>
<td></td>
<td>*5 years</td>
</tr>
<tr>
<td>8.12</td>
<td></td>
<td>*2 years</td>
</tr>
<tr>
<td>8.13</td>
<td></td>
<td>*2 years</td>
</tr>
<tr>
<td>Category 9</td>
<td>Operations and Accountability – Data and Analysis</td>
<td>Reviewed: Annually or*</td>
</tr>
<tr>
<td>9.1</td>
<td></td>
<td>*2 years</td>
</tr>
<tr>
<td>9.2</td>
<td></td>
<td>*2 years</td>
</tr>
<tr>
<td>9.3</td>
<td></td>
<td></td>
</tr>
<tr>
<td>9.4</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

End Document
I. POLICY STATEMENT

The purpose of this policy is to identify the responsibilities, standards, and authority of Audit and Management Services (AMS). AMS provides independent, objective assurance, and consulting services designed to add value and improve Department operations. AMS helps Management accomplish its objectives by systematic, disciplined evaluations of the effectiveness of governance, risk management, and control processes.

II. APPLICABILITY

This policy applies to AMS staff and:

- the interaction, involvement, and consultation with DES programs and DES contracted entities.
- the application of principles and practices appropriate to a professional internal audit function.

III. AUTHORITY

AMS performs its responsibilities according to applicable federal laws and regulations and state statutes. To accomplish this it shall have full and free access to personnel records and all hard copy and electronic records, reports, audits, reviews, documents, or other materials available to the organization.

IV. DEFINITIONS

AMS: Audit and Management Services.

Department: The Department of Economic Security.

Internal Controls: The policies, procedures, and activities designed to ensure that risks are contained within the tolerances identified by management.

Management: Executives in senior positions within the organization responsible for organizing, leading, and controlling agency and program activities and directing resources to achieve goals.

Risk: The possibility of an event occurring that will have an impact on the achievement of objectives.
V. STANDARDS

A. Overview

AMS strives to assist all members of management in effectively meeting their responsibilities for various state and federal programs by:

1. Conducting programmatic, compliance, and financial audits within the Department to determine adherence to Federal and State laws and regulations, and Department policies and procedures.

2. Providing independent analysis, assessments, time studies, and other management services to evaluate the effectiveness and efficiency of governance and risk management.

3. Conducting compliance and billing audits of providers.

4. Performing risk assessments and evaluating the adequacy, effectiveness, and efficiency of internal control systems within the Department.

5. Coordinating subrecipient single audit activities for all Department programs. This includes the request for and reviews of subrecipient single audits and notification to the programs of the single audit status of their subrecipients.

6. Tracking audits and reviews of the Department conducted by external entities and providing Management with summaries of issues, responses, and due dates.

B. Attribute Standards

1. Collectively AMS staff shall possess the knowledge, skills, and professional proficiencies needed to perform its responsibilities. These include but are not limited to:

   a. Proficiency in accounting principles and techniques.

   b. Knowledge to identify risks and to evaluate associated internal controls.

   c. Knowledge to identify indicators of fraud.

   d. Knowledge of IT risks and controls and available technology-based audit techniques.

   e. Understanding of management principles sufficient to recognize and evaluate deviations from good business practices.

   f. Skills in understanding human relations and in maintaining satisfactory relationships with clients.

   g. Skills in oral and written communications to effectively convey objectives, conclusions, and recommendations.
2. AMS staff shall maintain an independent state of mind to ensure objectivity in the performance of projects.

3. AMS staff shall respect the confidentiality of information acquired during projects.

4. AMS staff shall fulfill their responsibilities with professional care and integrity.

C. Performance Standards

1. AMS will obtain objective, sufficient, and appropriate evidence to support findings and conclusions reported to Management.

2. AMS will provide proper supervision of persons performing audits and management services and conduct proper review of work performed.

D. Reports

1. AMS shall issue a timely report or management letter to Management that details the scope, findings, and recommendations for each project.

2. Program management shall respond to all findings and recommendations and provide a corrective action plan that resolves identified issues. Refer to the Report Issuance Process (Exhibit A). AMS shall report on the implementation status of the corrective action plan to respective management and Deputy Director(s).

3. AMS will provide a summary report of all projects to the Director and Deputy Directors annually or as otherwise directed.

E. Restrictions

AMS is a staff function and has no authority to make operation decisions, to direct program staff to take action, or to implement its recommendations. These tasks are the responsibility of Management.
AUDIT and MANAGEMENT SERVICES (AMS)
Report Issuance Process

The guidelines below are to be followed by the DES programs and by AMS.

1. AMS prepares and issues a draft report to the Assistant Director of the division that houses the subject program.

2. The division prepares responses to each finding and/or recommendation and forwards to AMS within 15 working days of report receipt for inclusion in the final report.

3. AMS schedules an exit conference with the Program to discuss the report and the responses within five working days of response receipt.

4. AMS prepares and issues the Final report to the Assistant Director within five working days of the exit conference. Sensitive reports go to the Deputy Directors before the final report is issued.

5. The division provides a detailed corrective action plan to AMS within 10 working days of final report issuance date. AMS will monitor status of implementation.

6. AMS issues the final packet to the Deputy Directors, which includes the final report and the corrective action plan.

7. AMS schedules an exit conference with the Deputy Directors and the Assistant Director within five working days of packet issuance.
I. POLICY STATEMENT

The purpose of this policy is to:

1. Identify and describe the subrecipient monitoring forms required to be completed by the contract initiator at the time of contract award.

2. Outline the procedures to be followed after the subrecipient monitoring forms are completed by the contract initiator.

3. Define the responsibilities of the contract initiator and the Office of Procurement regarding the subrecipient monitoring forms and procedures.

II. APPLICABILITY

This policy applies to Department staff assigned from a Program or Administration that define the need for a contract service and who have the responsibility for the overall monitoring of the contract.

III. PROCEDURE

Each DES Division is responsible for establishing a procedure to ensure compliance with the standards of this policy.

IV. AUTHORITY

Office of Management and Budget (OMB) Circular A-133, Subpart D. § 400 (d)
29 CFR 99, Audits of States, Local Governments, and Non-Profit Organizations.

V. DEFINITIONS

**Contract Initiator:** Staff assigned from the program or administration that defines the need for the contract service and has responsibility for the overall monitoring of the contract.

**Contract Monitoring Tools:** Forms that detail the actions and procedures that contract and program staff are to follow in evaluating a contractor's compliance. Monitoring tools provide guidance to staff and help ensure consistency among monitors within the same program and are structured to require the monitors to sufficiently document the provider's compliance.
Department: The Department of Economic Security (DES).

Division Contract Manager: The individual in each division designated to oversee the effective management of division-initiated contracts.

Subrecipient: A nonfederal entity that expends federal awards received from a pass-through entity to carry out a federal program but does not include an individual who is a beneficiary of such a program.

Vendor: A dealer, distributor, merchant, or other seller providing goods or services that are required for the conduct of a federal program. These goods or services may be for an organization’s own use or for the use of beneficiaries of the federal programs.

VI. STANDARDS

A. Contracts

1. The Department establishes contracts with two types of entities – vendors and subrecipients. Based on the provisions of Office of Management and Budget (OMB) Circular A-133, Subpart D, § 400(d), the Department has specific monitoring obligations for subrecipient contracts.

2. Contract initiators are required to perform appropriate monitoring procedures for all subrecipients expending federal awards by means of, for example, site visits, limited scope audits, reviews of documentation supporting requests for reimbursement, etc.

3. Contract initiators need to consider various risks, such as the relative size and complexity of the federal awards administered and program requirements carried out by the subrecipient, the Department’s prior experience with the subrecipient, etc., in determining appropriate subrecipient monitoring procedures to be performed.

B. Vendor Versus Subrecipient Determination

1. Contract initiators must determine if the contractor is a vendor or a subrecipient.

2. The Vendor/Subrecipient Determination Form (PPP-1115A) has been developed to assist the program in making consistent, uniform vendor versus subrecipient determinations.

   a. This form must be completed at the time of contract award and maintained on file by the contract initiator.

   b. The appropriate box on the Contract Coordination Sheet (PUR-1017A) must be checked indicating whether the contractor is a vendor or subrecipient.

   c. The Contract Coordination Sheet must be submitted to the Office of Procurement for entry into the DES Contract Tracking System.

3. When there is difficulty making the determination of vendor versus subrecipient, the contract initiator should consider contacting their federal funding source representatives for guidance. Additionally, the contract initiator may want to contact other states to gather input on the determination they have made with similar contracts.
C. Subrecipient Monitoring Forms

1. For all subrecipient contracts, the subrecipient monitoring forms shall be completed by the contract initiator at the time of contract award and prior to the start of service delivery under the contract.

2. Payment on the contract shall not be initiated until all forms are complete and the contract is properly entered into the Financial Management Control System (FMCS). All forms must be maintained on file for audit purposes by the person responsible for ensuring compliance with contract monitoring requirements.

3. Subrecipient monitoring forms include:

a. **Vendor/Subrecipient Determination Form (PPP-1115A)**. This form is used to guide contract initiators through the determination of whether a contractor is a vendor or a subrecipient.

b. **Subrecipient Fact Sheet (PPP-1112A)** or (PPP-1113A). The purpose of this form is to provide each subrecipient with the Code of Federal Domestic Assistance (CFDA) title and number, award name and number, and award year of the federal monies being passed through from DES as required by OMB Circular A-133, Subpart D §400(d). When completed, the contract initiator shall send a copy to the contractor for retention in their files. There are two versions of this form:

i. The PPP-1112A is used for contracts where a single funding source is being used on the contract. A copy of the PPP-1112A is forwarded to the Office of Procurement.

ii. The PPP-1113A is used when multiple sources of funding are used on the same contract. A copy of the PPP-1112A is forwarded to the Office of Procurement.

iii. When contract funding changes from a single source to multiple sources during the term of the contract, the PPP-1113A must be completed and maintained by the contract initiator with copies forwarded to the subrecipient and to the Office of Procurement (Site Code 805Z) no later than 15 business days following the change and prior to initiation of any payments for services received following the funding change.

c. **Subrecipient Information Sheet/Check List (PPP-1114A)**. This form has two purposes.

i. The **Information Sheet** is used to document and assess potential risk factors related to the contract in determining the monitoring procedures to be performed.

ii. The **Check List** used to document what procedures will be performed to monitor the contract through the contract year.

iii. This form must be completed by the contract initiator at the initiation of the contract AND prior to the beginning of each new fiscal year in which the contract will be active.
iv. The Check List shall be updated by the contract initiator as monitoring is done on the contract and retained for audit purposes.

v. The Check List does not substitute for development of a Contract Monitoring Tool.

d. Contract Coordination Sheet (PUR-1017A). The Contract Coordination Sheet is completed by the contract initiator at the time of contract award and prior to delivery of services from the contractor.

i. This form is used to document the information required to enter the contract into the FMCS system to generate payment, including contractor identifying information, the contract value, and the Department funding stream that will be used to reimburse the contractor.

ii. The completed form shall be provided to the Department’s Office of Procurement at Site Code 805Z and a copy maintained in the contract initiator file.

D. Subrecipient Contract Monitoring Responsibility

1. Each Division shall identify a Division Contract Manager. Each Division Contract Manager is responsible for developing a Division Contract Monitoring Tool. This tool shall:

a. Define the activities that are to be done by the Division when monitoring subrecipient contracts.

b. Be structured to ensure that proper documentation of the monitoring activities is created.

2. The contract initiator is responsible for:

a. Completing all required contract monitoring forms at contract initiation, the start of each new fiscal year, and at any other time as is determined necessary.

b. Checking the box on the Contract Coordination Sheet indicating whether the contractor is a vendor or subrecipient before submitting it to the Office of Procurement.

c. Providing a copy of the completed Fact Sheet to the subrecipient.

d. Conducting appropriate contract monitoring activities based on the Information Sheet risk assessment, the completed Check List, and the Division Contract Monitoring Tool.

e. Documenting on the Check List and the Division Contract Monitoring Tool what contract monitoring activities were performed, including the dates the activities were performed.

f. Maintaining a copy of the completed Vendor/Subrecipient Determination Form, Subrecipient Information Sheet/Check List, Monitoring Documentation and Fact Sheet in the subrecipient file for audit purposes.
g. Notifying the Office of Procurement in writing immediately upon determination of potential compliance issues with a contract.

3. The Office of Procurement is responsible for:

a. Ensuring that the contract initiator has checked the box on the *Contract Coordination Sheet* indicating whether the contractor is a vendor or subrecipient. The contract will not be executed until the program has indicated by checking the appropriate box on the *Contract Coordination Sheet* whether the contractor is a vendor or subrecipient.

b. Providing Audit and Management Services (AMS) with a list from its contracts database of the Department’s subrecipients to help ensure that all required single audit reports are requested by AMS.

c. Notifying the contract initiator in writing immediately upon determination of a potential contractor issue that may impact service delivery under the contract.

VII. FORMS INDEX

*Vendor Subrecipient Determination* (PPP-1115A)
*Contract Coordination Sheet* (PUR-1017A)
*Subrecipient Fact Sheet (Single Funding Source)* (PPP-1112A)
*Subrecipient Fact Sheet (Multiple Funding Sources)* (PPP-1113A)
*Subrecipient Information Sheet/Check List* (PPP-1114A)
**Federal Poverty Guidelines (FPG) - Income thresholds for the last 30 days by percent of FPG**

<table>
<thead>
<tr>
<th>Number of Household Members &gt;&gt;</th>
<th>1</th>
<th>2</th>
<th>3</th>
<th>4</th>
<th>5</th>
<th>6</th>
<th>7</th>
<th>8</th>
<th>9</th>
<th>10</th>
<th>11</th>
<th>12</th>
<th>For &gt;12 Add</th>
</tr>
</thead>
<tbody>
<tr>
<td>0%-75% of Poverty = At or under 75% of the FPG, FYI..</td>
<td>$753</td>
<td>$1,015</td>
<td>$1,276</td>
<td>$1,537</td>
<td>$1,798</td>
<td>$2,060</td>
<td>$2,321</td>
<td>$2,582</td>
<td>$2,843</td>
<td>$3,105</td>
<td>$3,366</td>
<td>$3,627</td>
<td>$261</td>
</tr>
<tr>
<td>76%-100% of Poverty = Above 75% and at or below 100% of FPG. FYI - for reporting and programs with an income limit of 100% of poverty.</td>
<td>$1,005</td>
<td>$1,353</td>
<td>$1,701</td>
<td>$2,050</td>
<td>$2,398</td>
<td>$2,746</td>
<td>$3,095</td>
<td>$3,443</td>
<td>$3,791</td>
<td>$4,140</td>
<td>$4,488</td>
<td>$4,836</td>
<td>$348</td>
</tr>
<tr>
<td>101%-125% of Poverty = Above 75% and at or below 125% of FPG. Threshold for: NHN STCS, CSBG clients aged 59 and under without disabilities. For CSBG/STCS clients 60+ or persons with disabilities see: 126%-150% of Poverty below.</td>
<td>$1,256</td>
<td>$1,691</td>
<td>$2,127</td>
<td>$2,562</td>
<td>$2,997</td>
<td>$3,433</td>
<td>$3,868</td>
<td>$4,304</td>
<td>$4,739</td>
<td>$5,175</td>
<td>$5,610</td>
<td>$6,045</td>
<td>$435</td>
</tr>
<tr>
<td>126%-150% of Poverty = Above 125% and at or below 150% of FPG. Threshold for: STCS, NHN and CSBG clients aged 60+, persons with disabilities. For LIHEAP clients see next section, LIHEAP ONLY.</td>
<td>$1,507</td>
<td>$2,030</td>
<td>$2,552</td>
<td>$3,075</td>
<td>$3,597</td>
<td>$4,120</td>
<td>$4,642</td>
<td>$5,165</td>
<td>$5,687</td>
<td>$6,210</td>
<td>$6,732</td>
<td>$7,255</td>
<td>$522</td>
</tr>
</tbody>
</table>

**LIHEAP ONLY - Income Thresholds by Household Size**

<table>
<thead>
<tr>
<th>Number of Household Members &gt;&gt;</th>
<th>1</th>
<th>2</th>
<th>3</th>
<th>4</th>
<th>5</th>
<th>6</th>
<th>7</th>
<th>8</th>
<th>9</th>
<th>10</th>
<th>11</th>
<th>12</th>
<th>For &gt;12 Add</th>
</tr>
</thead>
<tbody>
<tr>
<td>The household income limit for the last 30 days for LIHEAP is 60% of SMI for households sized 6 and under. For households sized 7 and over, the income limit is 150% of FPG - FPL UPDATED FOR SFY 2018</td>
<td>$1,786</td>
<td>$2,335</td>
<td>$2,885</td>
<td>$3,435</td>
<td>$3,984</td>
<td>$4,534</td>
<td>$4,642</td>
<td>$5,165</td>
<td>$5,687</td>
<td>$6,210</td>
<td>$6,732</td>
<td>$7,255</td>
<td>$522</td>
</tr>
</tbody>
</table>

**LIHEAP ONLY - Energy Points for Income by Household Size**

<table>
<thead>
<tr>
<th>Number of Household Members &gt;&gt;</th>
<th>1</th>
<th>2</th>
<th>3</th>
<th>4</th>
<th>5</th>
<th>6</th>
<th>7</th>
<th>8</th>
<th>9</th>
<th>10</th>
<th>11</th>
<th>12</th>
<th>For &gt;12 Add</th>
</tr>
</thead>
<tbody>
<tr>
<td>A) 5 points At or below 25% of 60% of SMI or 150% of FPG for households sized 7 or more &gt;&gt;</td>
<td>$446</td>
<td>$583</td>
<td>$721</td>
<td>$858</td>
<td>$996</td>
<td>$1,133</td>
<td>$1,159</td>
<td>$1,185</td>
<td>$1,210</td>
<td>$1,236</td>
<td>$1,262</td>
<td>$1,288</td>
<td>$130</td>
</tr>
<tr>
<td>B) 4 points Above 25% and up to 50% of 60% of SMI &gt;&gt; or above 150% for households sized 7 or more &gt;&gt;</td>
<td>$893</td>
<td>$1,167</td>
<td>$1,442</td>
<td>$1,717</td>
<td>$1,992</td>
<td>$2,267</td>
<td>$2,318</td>
<td>$2,370</td>
<td>$2,421</td>
<td>$2,473</td>
<td>$2,524</td>
<td>$2,576</td>
<td>$261</td>
</tr>
<tr>
<td>C) 3 points Above 50% and up to 75% of 60% of the SMI &gt;&gt; or above 150% for households sized 7 or more</td>
<td>$1,339</td>
<td>$1,751</td>
<td>$2,164</td>
<td>$2,576</td>
<td>$2,988</td>
<td>$3,400</td>
<td>$3,477</td>
<td>$3,555</td>
<td>$3,632</td>
<td>$3,709</td>
<td>$3,787</td>
<td>$3,864</td>
<td>$391</td>
</tr>
<tr>
<td>D) 2 points Above 75% of 60% of SMI or above 150% of FPG for households sized 7 or more. &gt;&gt;</td>
<td>$1,786</td>
<td>$2,335</td>
<td>$2,885</td>
<td>$3,435</td>
<td>$3,984</td>
<td>$4,534</td>
<td>$4,637</td>
<td>$4,740</td>
<td>$4,843</td>
<td>$4,946</td>
<td>$5,049</td>
<td>$5,152</td>
<td>$522</td>
</tr>
</tbody>
</table>
CSBG STATE PLAN 2017-2018
AMENDMENT
PLACHOLDER FOR FFY 2018
PUBLIC AND LEGISLATIVE HEARING
DOCUMENTS 2017

PENDING
Attachment 14.1a

CSBG State Plan FFYs 2017-2018
Section 14.1a Narrative Response

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

(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;

(i)The State has authorized increased benefit levels for the “working poor” when applying for utility assistance, defined as applicants from households reporting income from employment, self-employment/business income, or Unemployment Insurance, who have incomes that fall below 150 percent of the poverty level, and struggle to meet basic needs. CSBG supported programs such as the State authorized Short-Term Crisis Services (STCS), funded by Temporary Assistance for Needy Families (TANF) funds, may provide for work-related expenses such as necessary licensing fees, uniforms or transportation assistance through CSBG funded programs. The State allows eligible entities to use CSBG funds for these services for childless adults who do not qualify for this service under TANF rules.
(ii) DAAS/CAPS requires eligible entities to provide assistance for the purposes of obtaining or maintaining employment. The State Short-Term Crisis Services program (STCS), funded by TANF, is delivered by eligible entities and authorized to provide employment supports such as transportation, uniforms, equipment or licensing fees related to employment. DAAS/CAPS requires eligible entities to provide a description of activities that coordinate with local Workforce Innovation and Opportunity Act (WIOA) funded programs.

(iii) Eligible entities may coordinate with local education institutions and allow savings from asset development programs to be utilized for post-secondary and vocational education. Eligible entities may also utilize CSBG funds for form linkages with local partners to provide GED preparation and after school program or perform such activities with their own resources. Eligible entities also coordinate with or operate Head Start programs and in-house secondary education programs.

(iv) DAAS/CAPS authorizes eligible entities to use CSBG funds to support financial literacy programs and Volunteer Income Tax Assistance (VITA), as the need is identified in the community via the entities’ community needs assessments.

(v) DAAS/CAPS authorizes eligible entities to deliver CSBG supported eviction prevention programs, such as the State Short-Term Crisis Services (STCS) program, funded by TANF, to alleviate crisis by maintaining or establishing housing and utility services. Eligible entities may utilize CSBG funds to support the delivery of other federal, State, local, and private housing and home repair programs.

(vi) DAAS/CAPS makes available CSBG discretionary funds for emergency and disaster assistance to households in crisis involving sudden loss of their housing due to natural or manmade disasters or unforeseen incidents.

(vii), (I), (II) DAAS/CAPS authorizes eligible entities to utilize CSBG funds to support the development of linkages and local partnerships in the community that create robust and varied networks of public and private grassroots partnerships. DAAS/CAPS makes CSBG discretionary funds available for innovative projects related to this assurance, including developing partnerships with law enforcement agencies and projects to develop innovative and exemplary practices.
Attachment 14.1b

CSBG State Plan FFYs 2017-2018 –
Section 14.1b Narrative Response

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;

Example 1 Provided by a CAA:

City of Glendale Community Action Program: “The Glendale CAP works with and is a strong advocate of the Glendale Community Center, which is located in the "Heart of Glendale" neighborhood and is currently being operated by non-profit partners who coordinate, manage and deliver the programs run out of the same City of Glendale owned facility that houses the CAP office. CAP staff has established and maintains open communication with the center and its staff, who provides services to both low-income youth and adults living nearby. A CAP priority is to refer Glendale families to the Center for the wide variety of services they provide including the Y.W.C.A. Food & Nutrition program, GED classes, homework club, and recreational activities, many of which are specifically designed to deter criminal activities among youth. An operating goal of the Community Center is to reciprocate and to refer their families to the Glendale CAP for accessing family assistance services; thus increasing collaborative approaches to meeting family needs. In addition to youth development, the program helps to prevent and/or reduce youth crime.

CAP staff refers clients and youth to the Boys and Girls Club, Y.W.C.A, Glendale Elementary School District afterschool programs, Head-Start, Glendale Recreation Afterschool Programs (GRASP), Glendale Community Center, Rose Lane & O’Neil Community Centers and the Velma Teague Library, which is located in the center of the low-income neighborhoods of Glendale. Apart from the coordination and partnership efforts of the Network, after school programs are conducted by the Arizona Department of
Education Health which utilizes federal funding under the Community Learning Center Grant (CCLC) to support after-school programs for at-risk children.

Example 2 Provided by CAA/Limited Purpose Agency:

Portable Practical Educational Preparation (PPEP): PPEP’s Adult Employment and Vocational Training Programs provide a variety of education, employment and training services. Target populations are Adults, Dislocated Workers, Older Workers, Migrant and Seasonal Farmworkers and their dependents. PPEP also includes a High School Equivalency Program (HEP) for person 16 and older. Services vary from county to county. PPEP works with over 800 employers statewide, by referring qualified job applicants and offering incentives for hiring.

PPEP also targets at-risk youth. YouthBuild is a youth and community development program that simultaneously addresses core issues facing low-income communities: housing, education, employment, crime prevention, and leadership development.

The YouthBuild Program is a GED Preparation and Construction program offering AmeriCorps opportunities that include Community Service and Leadership Development. This program is for at-risk youth ages 16 – 24, who do not have a High School Diploma or GED. PPEP YouthBuild is the only agency in the Tucson Metro area that provides both Construction Training and GED preparation for youth. PPEP’s program also provides participants a stipend to help subsidize their income while they finish the program. PPEP also offers a YouthBuild program in rural Yuma County. YouthBuild participants must be legal U.S. residents.

In another youth oriented vocational program, PPEP partners with MPG Automotive to provide paid on-the-job training. MPG Automotive trained youth participants in the automotive industry and offered wages during training. PPEP used CSBG funds to reimburse 50 percent of the wages. MPG Automotive hires participants who successfully complete the on-the-job training to full time positions as mechanics’ helpers making $10.00 per hour.

In SFY 2015, there were 42 youth enrolled in both programs. 38 of these have graduated from the program. Of these graduates, 15 have earned their GEDs, and 22 have earned a Segal Education Award from AmeriCorps worth a $1,515 that can be used toward post-secondary education expenses.