

Community Services Block Grant

Program Years 2026–2027

State Plan DRAFT



CSBG State Plan

Program Name: Community Services Block Grant

Grantee Name: West Virginia

Report Name: CSBG State Plan

Report Period: 10/01/2025 to 09/30/2026

Report Status: Saved -- with Errors

Report Sections

- 1. CSBG Cover Page (SF-424M) Not included in draft plan***
- 2. Section 1: CSBG Lead Agency, CSBG Authorized Official, CSBG Point of Contact, and Official State Designation Letter (Not included in draft plan)***
- 3. Section 2: State Legislation and Regulation***
- 4. Section 3: State Plan Development and Statewide Goals***
- 5. Section 4: CSBG Hearing Requirements***
- 6. Section 5: CSBG Eligible Entities***
- 7. Section 6: Organizational Standards for Eligible Entities***
- 8. Section 7: State Use of Funds***
- 9. Section 8: State Training and Technical Assistance***
- 10. Section 9: State Linkages and Communication***
- 11. Section 10: Monitoring, Corrective Action, and Fiscal Controls***
- 12. Section 11: Eligible Entity Tripartite Board***
- 13. Section 12: Individual and Community Eligibility Requirements***
- 14. Section 13: Results Oriented Management and Accountability (ROMA) System***
- 15. Section 14: CSBG Programmatic Assurances and Information Narrative***
- 16. Section 15: Federal Certifications***

Section 1: CSBG Lead Agency, CSBG Authorized Official, CSBG Point of Contact, and Official State Designation Letter

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES Administration for Children and Families Community Services Block Grant (CSBG)		Form Approved OMB No:0970-0382 Expires:09/30/2025	
SECTION 1 CSBG Lead Agency, CSBG Authorized Official, CSBG Point of Contact, and Official State Designation Letter			
1.1. Identify whether this is a One-Year or a Two-Year Plan		<input type="radio"/> one-year <input checked="" type="radio"/> two-year	
1.1a. Provide the federal fiscal years this plan covers:		Year One 2026	Year Two 2027
1.2. Lead Agency and Authorized Official: Update the following information in relation to the lead agency and authorized official designated to administer CSBG in the state, as required by Section 676(a) of the CSBG Act. <i>Information should reflect the responses provided in the Application for Federal Assistance, SF-424M.</i>			
Has information regarding the state lead agency and authorized official changed since the last submission of the State Plan? <input checked="" type="radio"/> Yes <input type="radio"/> No			
If yes, select the fields that have been changed [Check all that apply]			
<input type="checkbox"/>	Lead Agency	<input type="checkbox"/>	Department Type
<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	Department Name
<input type="checkbox"/>	Authorized Official	<input type="checkbox"/>	Street Address
<input type="checkbox"/>		<input type="checkbox"/>	City
<input type="checkbox"/>	Zip Code	<input type="checkbox"/>	Office Number
<input type="checkbox"/>		<input type="checkbox"/>	Fax Number
<input type="checkbox"/>	Email Address	<input type="checkbox"/>	Website
1.2a. Lead agency		West Virginia Division of Economic Development	
1.2b. Cabinet or administrative department of this lead agency <i>[Check one and provide a narrative where applicable]</i>			
<input type="radio"/> Community Affairs Department			
<input type="radio"/> Community Services Department			
<input type="radio"/> Governors Office			
<input type="radio"/> Health Department			
<input type="radio"/> Housing Department			
<input type="radio"/> Human Services Department			
<input type="radio"/> Social Services Department			
<input checked="" type="radio"/> Other, describe			
Commerce			
1.2c. Cabinet or Administrative Department Name: Provide the name of the cabinet or administrative department of the CSBG authorized official		Department of Commerce	
1.2d. Authorized Official of the Lead Agency			
Name: Jennifer Ferrell		Title: Director of Community Advancement and Development	
1.2e. Street Address		1900 Kanawha Boulevard East , Bui Iding 3, Ste. 700	
1.2f. City		Charleston	1.2g. State WV
		1.2h. Zip 25305	
1.2i. Telephone number 304 558 - 2234 ext.		1.2j. Fax number 304 558 - 3248	
1.2k. Email address jennifer.lferrell@wv.gov		1.2l. Lead agency website https://wvcad.org	
1.3. Designation Letter: Attach the state's official CSBG designation letter. A new designation letter is required if the chief executive officer of the state and/or the designated agency has changed.			
1.4. CSBG Point of Contact: provide the following information in relation to the designated state CSBG point of contact. The state CSBG point of contact should be the person that will be the main point of contact for CSBG within the state.			

Has Information regarding to the state point of contact has changed since the last submission of the State Plan? <input checked="" type="radio"/> Yes <input type="radio"/> No			
If yes, select the fields that have changed [check all the apply]			
<input checked="" type="checkbox"/>	Agency Name	<input type="checkbox"/>	Point of Contact
<input type="checkbox"/>	City	<input type="checkbox"/>	Zip Code
<input type="checkbox"/>	Fax Number	<input type="checkbox"/>	Email Address
<input type="checkbox"/>		<input type="checkbox"/>	Website
1.4a. Agency Name West Virginia Division of Economic Development			
1.4b Point of Contact Name			
Name: Shelly Woda		Title: Sustainability Unit Manager	
1.4c. Street Address		1900 Kanawha Boulevard East , Bui lding 3, Ste. 700	
1.4d. City		Charleston	1.4e. StateWV
		1.4f. Zip 25305	
1.4g. Telephone Number 304 352 - 4154 ext.		1.4h. Fax Number 304 558 - 3248	
1.4i. Email Address Shelly.J.Woda@wv.gov		1.4j. Agency Website https://wvcad.org	
1.5. Provide the following information in relation to theState Community Action Association.			
There is currently a state Community Action Association within the state. <input checked="" type="radio"/> Yes <input type="radio"/> No			
Has Information regarding the state Community Action Association has changed since the last submission of the State Plan? <input type="radio"/> Yes <input checked="" type="radio"/> No			
If yes, select the fields that have been changed [Check all the apply]			
<input type="checkbox"/>	Agency Name	<input type="checkbox"/>	Executive Director
<input type="checkbox"/>	City	<input type="checkbox"/>	State
<input type="checkbox"/>	Office Number	<input type="checkbox"/>	Fax Number
<input type="checkbox"/>		<input type="checkbox"/>	Email Address
<input type="checkbox"/>	Website	<input type="checkbox"/>	RPIC Lead
1.5a. Agency Name West Virginia Community Action Partnerships, Inc			
1.5b. Executive Director or Point of Contact			
Name: Mary Chipps		Title: Executive Director	
1.5c. Street Address		One Creative Place	
1.5d. City		Charleston	1.5e. StateWV
		1.5f. Zip 25311	
1.5g. Telephone number 304 347 - 2277 ext.		1.5h. Fax number 304 347 - 2001	
1.5i. Email Address Mchipps@wvcap.org		1.5j. State Association Website https://wvcap.org/	
1.5k. State Association currently serves as the Regional Performance Innovation Consortia (RPIC) lead <input type="radio"/> Yes <input checked="" type="radio"/> No			

Section 2: State Legislation and Regulation

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

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SECTION 2 State Legislation and Regulation

2.1. CSBG State Legislation:

State has a statute authorizing CSBG ☐ Yes ☒ No

2.2. CSBG State Regulation:

State has regulations for CSBG ☐ Yes ☒ No

2.3. Legislation/Regulation Document: *Attach the legislation and/or regulations or provide a hyperlink(s) to the documents indicated under Item 2.1. and/or Item 2.2.*

2.4. State Authority:

Select a response for each of the following items about the state statute and/or regulations authorizing CSBG:

2.4a. Authorizing Legislation: State legislature enacts authorizing legislation or amendments to an existing authorizing statute, last federal fiscal year ☐ Yes ☒ No

2.4b. Regulation Amendments: State established or amended regulations for CSBG last federal fiscal year ☐ Yes ☒ No

Section 3: State Plan Development and Statewide Goals

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
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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.

West Virginia Community Advancement and Development works to encourage strong civic engagement through Infrastructure, Sustainability, Compliance, and Resiliency. WV CAD administers state and federal programs designed to improve the quality of life in West Virginia.

3.2. State Plan Goals:

Describe the state's CSBG-specific goals for state administration of CSBG under this State Plan.

(Note: This information is associated with State Accountability Measure 1Sa(i) and pre-populates the State's Annual Report, Module 1, Item B.1.)

1)To submit an application to the Secretary containing information and provisions that describe the programs for which assistance is sought under the community services block grant program prepared in accordance with and containing the information described in Section 676 of the Act. [675A(2)To use not less than 90 percent of the funds made available to the State by the Secretary under Section 675A or 675B of the Act to make grants to eligible entities for the stated purposes of the community services block grant program and to make such funds available to eligible entities for obligation during the fiscal year and the succeeding fiscal year. 3)To limit the amount of funds carried over to the succeeding fiscal year of an allocation. 4)To spend no less than 5 percent of the grant received under Section 675A or the State allotment received under section 675C(b)(1) for discretionary expenses. 5)To hold at least one hearing in the State with sufficient time and statewide distribution of notice of such hearing, to provide to the public an opportunity to comment on the proposed use and distribution of funds to be provided through the grant or allotment under Section 675A or '675B for the period covered by the State plan. [676(a)(2)(B)]. 6)To review the Organizational Standards electronic Self assessments bi-annually during monitoring and provide Technical Assistance Plans (TAPs) or Quality Improvement Plans (QIPs) to all WV CSBG Eligible Entities with the goal of meeting 100% of the Organizational Standards. 7)To provide timely communication to CEEs and statewide partners on the administration of CSBG, including, communication of grant requirements and training and technical assistance opportunities. 8)To annually assess CEE training needs in collaboration with the WV Community Action Partnership, and development a statewide training and technical assistance plan to provide targeted training opportunities focused on meeting the needs and achieving measurable outcomes. 11)To make continuous improvements in the overall quality and reliability of CSBG data and annual reporting.

3.3. State Plan Development:

Indicate the information and input the state accessed to develop this State Plan.

3.3a. Analysis of state-level tools *[Check all that apply applies and provide additional information 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)

☒ Monitoring Visits/Assessments

☐ Tools Not Identified Above (specify)

3.3b. Analysis of local-level tools *[Check all that applies and provide additional information where applicable]*

☒ Eligible Entity Community Needs Assessments

☒ Eligible Entity Community Action Plans

☐ Public Hearings/Workshops

☒ Tools Not Identified Above (e.g., State required reports)[specify]

West Virginia Training and Technical Assistance Plan

3.3c. Consultation with *[Check all that applies applies and provide additional information where applicable]*

☒ Eligible Entities (e.g., meetings, conferences, webinars; not including the public hearing)

☒ State Association

☒ National Association for State Community Services Programs (NASCSPP)

☒ Community Action Partnership (NCAP)

☐ Community Action Program Legal Services (CAPLAW)

☐ CSBG Tribal Training and Technical Assistance (T/TA) provider

☐ Regional Performance Innovation Consortium (RPIC)

☒ Association for Nationally Certified ROMA Trainers (ANCRT)

☐ Federal CSBG Office

Section 4: CSBG Hearing Requirements

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

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SECTION 4 CSBG Hearing Requirements

4.1. Public Inspection:

Describe the steps taken by the state to disseminate this State Plan to the public for review and comments prior to the public hearing, as required under Section 676(e)(2) of the Act.

1. The State Plan was posted on grantee office website for review at <https://wvcad.org/resources/public-notice>. 2. An ad was ran for 3 days in the state's largest newspapers across the state informing how to obtain a copy of the plan, that it's available for public comment, and attend the public hearing, which was held on August 2, 202 at 2:00 PM . 3.The State Plan was discussed in person with CEE EDs/CEOs and the State Association. 4. The draft State Plan was emailed to all CEEs on July 30, 202 notifying them of the public comment period and upcoming public hearing.

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

Elements of the plan were made available to CEEs incrementally throughout the year during statewide ED/CEO meetings with the CSBG State Office and State Association. The purpose is to discuss the plan 1-2 section(s) at a time in order to focus attention on the State's plan in each area of the plan with the ability to focus conversation on the different sections and obtain meaningful feedback. CEEs were notified by email on July 30, 2025 that the plan was posted for review and comment, and made aware of the date and location of the public hearing. The State Plan was available for comment beginning on July 30, 2025 online at <https://wvcad.org/sustainability/community-service-block-grant>. Ads were placed in newspapers across the state notifying the public of how to obtain and view a copy of the draft state plan, and also to provide information regarding the physical and virtual location of the public hearing that was scheduled to take place on 8/27/2025. Notice of the hearing was also filed with the WV Secretary of State's office for public review.

4.3. Public and Legislative Hearings:

In the table below, 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) andSection 676(a)(3) of the Act.

	Date	Location	Type of Hearing [Select an option]	If a combined hearing was held, confirm that the public was invited
1	02/12/2025	State Capitol, House Finance Committee Room 460M	Legislative	<input type="checkbox"/>
2	08/27/2025	1900 Kanawha Blvd. East, Building 3, Ste 800 Charleston, WV (Virtual Attendance Available)	Public	<input type="checkbox"/>

NOTE : States can add rows as needed for each hearing as needed

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

See attached: 1. Documentation of communication regarding the plan and hearings. 5. Public Hearing Agenda, sign-in sheet, and transcript. 6. Legislative Hearing Agenda and Minutes.

Section 5: CSBG Eligible Entities

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Community Services Block Grant (CSBG)

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SECTION 5 CSBG Eligible Entities

5.1. CSBG Eligible Entities:

In the table below, indicate whether each eligible entity in the state, is public or private, the type(s) of entity, and the geographical area served by the entity.

Note: Table 5.1 pre-populates the Annual Report, Module 1, Table C.1.

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

#	CSBG Eligible Entity	Geographical Area Served by county (Provide all counties)	Public or Nonprofit	Type of Entity [choose all that apply]
1	North Central West Virginia Community Action Association, Inc.	Barbour County, Greenbrier County, Marion County, Monongalia County, Pocahontas County, Preston County, Randolph County, Taylor County, Tucker County	Non-Profit	Community Action Agency
2	Southwestern Community Action Council, Inc.	Cabell County, Lincoln County, Mason County, Putnam County, Wayne County	Non-Profit	Community Action Agency
3	Nicholas Community Action Partnership, Inc.	Nicholas County, Clay County	Non-Profit	Community Action Agency
4	Eastern West Virginia Community Action Agency, Inc.	Grant County, Hampshire County, Hardy County, Mineral County, Morgan County, Pendleton County	Non-Profit	Community Action Agency
5	PRIDE Community Services, Inc.	Logan County, Kanawha County	Non-Profit	Community Action Agency
6	Community Resources, Inc.	Calhoun County, Doddridge County, Gilmer County, Jackson County, Pleasants County, Ritchie County, Roane County, Tyler County, Wetzel County, Wirt County, Wood County	Non-Profit	Community Action Agency
7	Coalfield Community Action Partnership, Inc.	Mingo County, Boone County	Non-Profit	Community Action Agency
8	Community Action of South Eastern West Virginia, Inc.	Mercer County, Monroe County, Summers County	Non-Profit	Community Action Agency
9	Mountainheart Community Services, Inc.	Wyoming County, Fayette County	Non-Profit	Community Action Agency
10	Mountain CAP of West Virginia Inc	Braxton County, Upshur County, Webster County	Non-Profit	Community Action Agency
11	Change, Incorporated	Brooke County, Hancock County, Marshall County, Ohio County	Non-Profit	Community Action Agency
12	Central West Virginia Community Action Association, Inc.	Harrison County, Lewis County	Non-Profit	Community Action Agency
13	Raleigh County Community Action Association, Inc.	Raleigh County	Non-Profit	Community Action Agency
14	Telamon Corporation	Berkeley County, Jefferson County	Non-Profit	Community Action Agency
15	Council of the Southern Mountains, Inc.	McDowell County	Non-Profit	Community Action Agency

5.2. Total number of CSBG eligible entities 15

5.3. Changes to Eligible Entities List:

Within the tables below, describe any changes that have occurred to the Eligible Entities within the state since the last federal fiscal Year (FFY), as applicable.

One or more of the following changes were made to the eligible entity list: [Check all that apply].

- ☒ Designation and/or Re-Designation
☒ De-Designations and/or Voluntary Relinquishments
☐ Mergers
☐ No Changes to Eligible Entities List

5.3a. Designation and Re-Designation: Identify any new entities that have beendesignated as eligible entities, as defined under Section 676A of the Act, since the last federal fiscal year.Include any eligible entities designated to serve an area previously not served by CSBG as well as any entities designated to replace another eligible entity that was terminated (de-designated) or that voluntarily relinquished its status as a CSBG eligible entity.

CSBG Eligible Entity	Type	Start Date	Geographical Area Served	Delete
Coalfield Community Action Partnership, Inc.	Permanent Re-Designation	06/25/2025	Boone County, Mingo County	
MountainHeart Community Services, Inc.	Permanent Re-Designation	06/25/2025	Fayette County, Wyoming County	
Nicholas Community Action Partnership, Inc.	Permanent Re-Designation	06/25/2025	Clay County, Nicholas County	
PRIDE Community Services, Inc.	Permanent Re-Designation	06/25/2025	Kanawha County, Logan County	
Southwestern Community Action Council, Inc.	Permanent Re-Designation	06/25/2025	Cabell County, Lincoln County, Mason County, Putnam County, Wayne County	
5.3b. Designation and Voluntary Relinquishments: Identify any entities that are no longer receiving CSBG funding. Include any eligible entities that have been terminated (de-designated) as defined under Section 676(c) and Section 676C of the Act, or voluntarily relinquished their CSBG eligible entity status since the last Federal Fiscal Year (FFY). Include any eligible entities designated to serve an area previously not served by CSBG as well as any entities designated to replace another eligible entity that was terminated (de-designated)				
CSBG Eligible Entity		Reason		Delete
EnAct, Inc.		Voluntarily Relinquished		
5.3c. Mergers: In the table below, provide information about any mergers or other combinations of two or more eligible entities that were individually listed in the prior State Plan.				
Original CSBG Eligible Entities	Surviving CSBG Eligible Entity	New Name (as applicable)	DUNS No.	Delete

Section 6: Organizational Standards for Eligible Entities

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
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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: Confirm whether the state will implement the CSBG Organizational Standards Center of Excellence (COE) organizational standards (as described in IM 138) or an alternative set during the federal fiscal year(s) of this planning period

☒ COE CSBG Organizational Standards ☐ Modified version of COE CSBG Organizational Standards ☐ Alternative set of Organizational Standards

6.1a. Modified Organizational Standards: In the case that the state is requesting to use modified COE-developed organizational standards, provide the proposed modification for the FFY of this planning period including the rationale.

N/A

6.1b. Alternative Organizational Standards: If using an alternative set of organizational standards, attach the complete list of alternative organizational standards.

6.1c. Alternative Organizational Standards Changes: If using an alternative set of organizational standards:

- 1) provide any changes from the last set provided during the previous State Plan submission;
- 2) describe the reasons for using alternative standards; and
- 3) describe how they are at least as rigorous as the COE- developed standards

☒ There were no changes from the previous State Plan submission

Provide reason for using alternative standards

Describe rigor compared to COE-developed Standards

6.2. Implementation: Check the box that best describes how 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:

6.3. Organizational Standards Assessment: Describe how the state assess eligible entities against organizational standards this federal fiscal year(s). *[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

6.3a. Assessment Process: Describe the planned assessment process.

The State's Organizational Standards review process includes review of the Organizational Standards as part of biannual comprehensive CSBG monitoring. The State will report to OCS on the standards annually in the CSBG Annual Report . Eligible entities will maintain electronic documentation of compliance with the standards in the state's data management system. The State will conduct a comprehensive desk review of the organizational standards and provide feedback within the data management system and within monitoring reports, which may result in the requirement of a Technical Assistance Plan (TAP) or a Quality Improvement Plan (QIP). The State will work with the WV Community Action Partnership, Inc. to develop timely and effective training to address common training needs among all eligible entities. The State is responsible for working with eligible entities to meet all organizational standards. Some standards may take several years to be met depending on the frequency at which the task occurs. Within the last two years, the state has continued established procedures for how CEEs maintain and renew assessments of the Organizational Standards. Within the state's data management system, CEEs will only reassess whether or not a standard has been met depending on the frequency at which each particular standard is required to occur. For instance, standard 7.1 requires that the the "organization has written personnel policies that have been reviewed by an attorney and approved by the governing board within the past 5 years." CEEs must enter the expiration date for each specific standard. Since this documentation is only required to be updated every 5 years, the state will only assess once within that time period. The system will notify the CEE prior to the expiration of each standard, at which point, the CEE will archive the record and provide updated documentation, a new expiration date, and the state will then review it during the next scheduled monitoring. The goal is to maintain compliance with the Organizational Standards, and simplify the validation process

performed by the State.			
6.4. Eligible Entity Exemptions: Will the state make exceptions in applying the organizational standards for certain eligible entities due to special circumstances or organizational characteristics (as described in IM 138)? <input type="radio"/> Yes <input checked="" type="radio"/> No			
6.4a. Provide the specific eligible entities the state will exempt from meeting organizational standards, and provide a description and a justification for each exemption			
Total Number of Exempt Entities: 0			
CSBG Eligible Entity		Description / Justification	Delete
6.5. Performance Target: Provide the percentage of eligible entities that the state expects to meet all the state-adopted organizational standards for FFY(S) for this planning period			
Year One	70%	Year Two	80%
Note: Item 6.5 is associated with State Accountability Measures 6Sa and prepopulate the Annual report, Module 1, Table D.2.			

Section 7: State Use of Funds

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
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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.

- ☐ Historic
- ☒ Base + Formula
- ☐ Formula Alone
- ☐ Formula with Variables
- ☐ Hold Harmless + Formula
- ☐ Other

7.1a. Formula Description: Describe the current practice for allocating CSBG funds to eligible entities.

BASE ALLOCATION: \$150,000 is allocated to each CEE + \$5,000 for each county within the designated service area. + FORMULA ALLOCATION: The amount remaining is divided by the total # of individuals in the state under 125% of the FPL producing a dollar amount to be allocated to each CEE for each individual under 125% of the FPL in the designated service area. The state updates the formula as poverty statistics become available. This may or may not cause significant changes to allocations depending on the number of individuals under 125% of the FPL in the designated service area.

7.1b. Statute: Does a state statutory or regulatory authority specify the formula for allocating "not less than 90 percent" funds among eligible entities? ☐ Yes ☒ No

7.2. Planned Allocation:

Specify the percentage of your CSBG planned allocation that will be funded to eligible entities and "not less than of 90 percent funds" as described under Section 675C(a) of the CSBG Act.

In the table, provide the planned allocation for each eligible entity receiving funds for the fiscal year(s) covered by this plan.

Note: This information pre-populates the state's Annual Report, Module 1, Table E.2.

Year One	90.00%	Year Two	90.00%
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Planned CSBG 90 Percent Funds

CSBG Eligible Entity	Year One Funding Amount \$	Delete
North Central West Virginia Community Action Association, Inc.	\$1,082,563	
Southwestern Community Action Council, Inc.	\$888,969	
Nicholas Community Action Partnership, Inc.	\$278,624	
Eastern West Virginia Community Action Agency, Inc.	\$403,633	
PRIDE Community Services, Inc.	\$819,251	
Community Resources, Inc.	\$774,330	
Coalfield Community Action Partnership, Inc.	\$336,971	
Community Action of South Eastern West Virginia, Inc.	\$442,779	
Mountainheart Community Services, Inc.	\$383,805	
Mountain CAP of West Virginia Inc	\$327,972	
Change, Incorporated	\$476,135	
Central West Virginia Community Action Association, Inc.	\$385,055	
Raleigh County Community Action Association, Inc.	\$406,843	
Telamon Corporation	\$475,508	
Council of the Southern Mountains, Inc.	\$244,363	
Total	\$7,726,801	

CSBG Eligible Entity Year Two

CSBG Eligible Entity	Year Two Funding Amount \$	Delete
North Central West Virginia Community Action Association, Inc.	\$1,082,563	
Southwestern Community Action Council, Inc.	\$888,969	
Nicholas Community Action Partnership, Inc.	\$278,624	
Eastern West Virginia Community Action Agency, Inc.	\$403,633	

PRIDE Community Services, Inc.	\$819,251
Community Resources, Inc.	\$774,330
Coalfield Community Action Partnership, Inc.	\$336,971
Community Action of South Eastern West Virginia, Inc.	\$442,779
Mountainheart Community Services, Inc.	\$383,805
Mountain CAP of West Virginia Inc	\$327,972
Change, Incorporated	\$476,135
Central West Virginia Community Action Association, Inc.	\$385,055
Raleigh County Community Action Association, Inc.	\$406,843
Telamon Corporation	\$475,508
Council of the Southern Mountains, Inc.	\$244,363
Total	\$7,726,801

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).

Ninety percent (90%) of the CSBG funds allotted to the State will be allocated to CSBG eligible entities based on the established formula. CEEs will have 30 days to complete and submit their application. The State will then review applications for completeness within 30 days. Once an application is approved, the State will issue a Grant Agreement and award notification to the CEE based on the level of funding received from ACF at that time. Grant Agreements are distributed and executed prior to the start of the program year. Typically, the first award notice will represent the first quarter of funding made available to the State by the U.S. Administration for Children and Families. The State will not permit an entity to spend multiple allotments simultaneously. The distribution formula will be updated as new poverty data becomes available.

7.3a Distribution Method: Select the option below that best describes the distribution method the state uses to issue CSBG funds to eligible entities:

☐ Reimbursement

☐ Advance

☒ Hybrid

☐ Other

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. Distribution Consistency: If no, describe state procedures to ensure funds are made available to eligible entities consistently and without interruption.

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

This actually depends on when funds are made available to the State in relation to the start of the CSBG program year in WV, which is January 1. Once the State receives its Federal award letter, the CSBG Administrator provides a copy to the State fiscal office to set up the Federal award in the state accounting system OASIS, and notifies Eligible Entities of the award amount. West Virginia operates its CSBG program on a calendar year of January 1 through December 31, which means funding is delayed by 3 months. Since CSBG grants are two year grants, this practice does not impede eligible entities from being able to draw down CSBG funds since they will be spending their 4th quarter allocation from October December. Due to the uncertainty of when Federal awards will be received, this method allows the eligible entities to better plan program expenditures and allows for consistent grant start dates from year to year. This process ensures that funds are provided upon request and without interruption. CSBG Eligible Entities apply for funding through an application process during October based on estimated award amounts. Applications are reviewed by the State office during November, and Grant Agreements and 1st quarter award notices are sent out in December for a January 1 start date. To ensure all funds are expended by the program completion date, the State works closely with agencies that are still spending carry over funds after the 12th month of program operations. If needed, the State will approve a formal request from an eligible entity to extend the period of the grant beyond 12 months. Extensions will be granted in 3 month increments until all funds are spent. CEEs are not permitted to spend a new award until all previous year funds are completely spent. If an extension is needed, an agency must request a no cost, time extension in the 11th month of the current program year in order to carry over funds.

7.5. Distribution of Funds Performance Management Adjustment:

Describe the state's strategy for 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 2Sb and may prepopulate the state's annual report form.

ACSI scores and communication with eligible entities indicate high satisfaction with the states grant administration procedures. The state intends to continue procedures that are in place which consist of requiring eligible entity submission of applications and community action plans in October of each year. Applications are submitted electronically through the State of West Virginia wvOASIS Vendor Self-serve portal. Applications are reviewed by program managers, evaluated, and routed to Agency Level 2 for review before routing to the Governors office for review and approval. Once approved, grants are generated electronically, and grant agreements are completed and routed for signature by the state office and eligible entities. This process is completed prior to the start of the CSBG programmatic year which operates from January 1st through December 31st.

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

Note: This information pre-populates the state's Annual Report, Module 1, Table E.4.

7.6. Allocated Funds: Specify the percentage of your CSBG planned allocation for administrative activities for the FFY(s) covered by this State plan.

Year One (0.00%)	5.00	Year Two (0.00%)	5.00
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7.7. State Staff: Provide the number of state staff positions to be funded in whole or in part with CSBG funds for the FFY(s) covered by this State Plan

Year One	10.00	Year Two	10.00
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7.8. State FTEs: Provide the number of state Full Time Equivalents (FTEs) to be funded with CSBG funds for the FFY(s) covered by this State Plan

Year One	4.00	Year Two	4.00
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7.9. Remainder/Discretionary Funds Use: Does the state have remainder/discretionary funds, as described in Section 675C(b)(1) of the CSBG Act? ☒ Yes ☐ No

If yes, provide the allocated percentage and describe the use of the remainder/discretionary funds in the table below.

Year One (0.00%)	5.00%	Year Two (0.00%)	5.00%
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Use of Remainder/Discretionary Funds(See Section 675C(b)(1) of the CSBG Act)

Note: This response will link to the corresponding assurance, Item 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 Items 7.9a. - 7.9c. If allocation is not possible, the state may allocate the funds to the main category with which the activity is associated.

Note: This information is associated with State Accountability Measures 3Sa and pre-populates the annual report Module 1, Table E.7.

Remainder/Discretionary Fund Uses	Year One Planned \$	Brief description of services/activities and/or activities
7.9a. Training/technical assistance to eligible entities	\$280,000.00	These planned services/activities will be described in State Plan Item 8.1.
7.9b. Coordination of state-operated programs and/or local programs	\$0.00	These planned services/activities will be described in State Plan Section 9, state Linkages and Communication.
7.9c. Statewide coordination and communication among eligible entities	\$150,000.00	These planned services/activities will be described in State Plan Section 9, state Linkages and Communication.
7.9d. Analysis of distribution of CSBG funds to determine if targeting greatest need	\$0.00	
7.9e. Asset-building programs	\$0.00	
7.9f. Innovative programs/activities by eligible entities or other neighborhood groups	\$0.00	
7.9g. State charity tax credits	\$0.00	
7.9h. Other activities, specify in column 3	\$0.00	
Total	\$430,000.00	

Remainder/Discretionary Fund Uses	Year Two Planned \$	Brief description of services/activities
7.9a. Training/technical assistance to eligible entities	\$280,000.00	These planned services/activities will be described in State Plan Item 8.1.
7.9b. Coordination of state-operated programs and/or local programs	\$0.00	These planned services/activities will be described in State Plan Section 9, state Linkages and Communication.
7.9c. Statewide coordination and communication among eligible entities	\$150,000.00	These planned services/activities will be described in State Plan Section 9, state Linkages and Communication.
7.9d. Analysis of distribution of CSBG funds to determine if targeting greatest need	\$0.00	
7.9e. Asset-building programs	0	
7.9f. Innovative programs/activities by eligible entities or other neighborhood groups	\$0.00	
7.9g. State charity tax credits	\$0.00	
7.9h. Other activities, specify in column 3	\$0.00	
Total	\$430,000.00	

7.10. Remainder/Discretionary Funds Partnerships: Select the types of organizations, if any, the State Plans 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]

☐ The state directly carries out all activities (No Partnerships)

☐ The state partially carries out some activities

<input checked="" type="checkbox"/>	CSBG eligible entities (<i>if checked, include the expected number of CSBG eligible entities to receive funds</i>) 15
<input type="checkbox"/>	Other community-based organizations
<input checked="" type="checkbox"/>	State Community Action association
<input type="checkbox"/>	Regional CSBG technical assistance provider(s)
<input type="checkbox"/>	National technical assistance provider(s)
<input type="checkbox"/>	Individual consultant(s)
<input type="checkbox"/>	Tribes and Tribal Organizations
<input type="checkbox"/>	Other
Note: <i>This response will link to the corresponding CSBG assurance, item 14.2.</i>	
7.11. Use of Remainder/Discretionary Funds Performance Management Adjustment: Describe any adjustments the state will make to 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: <i>This information is associated with State Accountability Measures 3Sb, and may pre-populate the State's annual report form.</i>	
The State is making some adjustments to the use of remainder/discretionary funds under this State Plan as compared to the most recent plan. Adjustments include: 1. Increasing the amount of Training and Technical Assistance grants to CEEs from 12k to 15k. The cost of training and attendance at conferences has continued to increase significantly. 2. The amount of funding for the State Association will increase to fund training and technical assistance events including the state education conference and periodic workshops. Each year, the state makes any unused administrative funds budgeted for the state office available to CEEs for discretionary projects that meet the goals of CSBG to ensure all federal funds are spent. CSBG annual reporting will reflect the actual expenditures. These additional discretionary dollars will be available to CEEs, who in year 2, quarter 2 have met or exceeded expenditure goals, are in good standing from a compliance perspective, and are in need of additional funds for CSBG purposes. These funds will be awarded to CEEs meeting the prescribed criteria who have submitted a complete project proposal and detailed budget. The State maintains flexibility in how additional discretionary funds will be utilized.	

Section 8: State Training and Technical Assistance

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

Form Approved
OMB No: 0970-0382
Expires:09/30/2025

SECTION 8 State Training and Technical Assistance

8.1. Training and Technical Assistance Plan: 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. The T/TA plan should include all planned CSBG T/TA activities funded through the administrative or remainder/discretionary funds of this CSBG award (as reported in Section 7). The CSBG T/TA plan should include training and technical assistance conducted directly by the state or through partnerships (as specified in 8.3). Add a row for each activity: indicate the timeframe; whether it is training, technical assistance, or both; and the topic.

Note: This information is associated with State Accountability Measure 3Scand pre-populates the Annual Report, Module 1, Table F.1.

Training and Technical Assistance - Year One

	Planned Timeframe	Training, Technical Assistance, or Both	Topic	Brief Description of "Other"
1	FY1-Q1	Training	Other	Uniform Guidance Workshop
2	FY1-Q1	Training	Organizational Standards - General	
3	FY1-Q1	Training	Monitoring	
4	FY1-Q1	Technical Assistance	Other	Community Action Plan / ROMA Logic Models with Targeting / CSBG Budgeting
5	FY1-Q2	Training	Reporting	
6	Ongoing / Multiple Quarters	Both	Other	16 Individual T/TA Grants to CEEs for support of individual needs.
7	FY1-Q3	Training	Other	State Association Education Conference Sessions
8	All quarters	Both	Technology	

Training and Technical Assistance - Year Two

	Planned Timeframe	Training, Technical Assistance, or Both	Topic	Brief Description of "Other"
1	Ongoing / Multiple Quarters	Both	Other	16 Individual T/TA Grants to CEEs for support of individual needs.
2	FY2-Q1	Training	Other	Community Action Plan / ROMA Logic Models with Targeting / CSBG Budgeting
3	FY2-Q1	Training	Organizational Standards - General	
4	FY2-Q2	Training	Other	Identifying, Reporting, and Preventing Waste, Fraud, and Abuse
5	FY2-Q2	Training	Reporting	
6	All quarters	Both	Technology	
7	FY2-Q3	Training	Other	State Association Education Conference Sessions
8	Ongoing / Multiple Quarters	Both	Other	16 Individual T/TA Grants to CEEs for support of individual needs.

8.1a. Training and Technical Assistance Budget: The planned budget for the training and technical assistance plan (as indicated in the Remainder/Discretionary Funds table in item 7.9):

Year One	\$280,000	Year Two	\$280,000
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8.1b. Training and Technical Assistance Collaboration: Describe how the state will collaborate with the state association and other stakeholders in the planning and delivery of training and technical assistance.

The state works collaboratively with the WV Community Action Partnership to analyze an annual training and technical assistance needs survey completed by each CEE. Once the survey results are received, the state office and Association then work together with the Association TTA Committee to determine high priority needs, and prepare a training and technical assistance plan for the upcoming program year. The State and Association work closely together to plan and deliver training to CEEs throughout the year. The Association receives CSBG discretionary funds to facilitate the provision of state wide training. While the T/TA surveys assist in identifying topics for the annual state training conference, it also identifies opportunities for connecting CEEs to existing training resources, and opportunities for more in-depth workshops and webinars that are needed. The State is working with the WV Community Action Partnership to enhance the WV Training Academy learning management system to create content and provide access to consistent and reliable training related to topics such as Tripartite Boards, Basics of ROMA, CSBG Annual Reporting, etc. The WV Community Action Partnership's Training Coordinator will work to create learning content and assign training to CEE staff and board members. The State and State Association will meet monthly to continue working on the provision of timely and necessary T/TA.

8.2. Organizational Standards Technical Assistance: Does the state have Technical Assistance Plans (TAPs) in place for all eligible entities with unmet organizational standards, if appropriate? ☒ Yes ☐ No

Note: 8.2 is associated with State Accountability Measure 6Sb. The state should put a TAP in place to support eligible entities with one or more unmet organizational standards.

8.2a. Address Unmet Organizational Standards: Describe the state's plan to provide T/TA to eligible entities to ensure they address unmet Organizational Standards. The state developed a CSBG Organizational Standards Quick Reference Guide to assist CEEs in knowing how to document compliance with the standards. Any unmet standards noted in a monitoring report will be addressed in the statewide data management system and in monitoring reports that may require a QIP. The state provides feedback and technical assistance during onsite monitoring visits, and works with the State Association to review a list of unmet standards at least annually to determine if there is a trend in unmet standards that would prompt a need for statewide training or technical assistance to address concerns. In FY2025, the State has noted a concern on the increasing number of unmet organizational standards, and intends to work with the State Association to plan an Organizational Standards workshop in year 1, quarter 1 of FY2026.

8.3. Training and Technical Assistance Organizations: Indicate the types of organizations through which the State Plans to provide training and/or technical assistance as described in item 8.1, and briefly describe their involvement. *[Check all that apply.]*



All T/TA is conducted by the state



CSBG eligible entities (*if checked, provide the expected number of CSBG eligible entities to receive funds*) 15



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

8.4. CSBG-Funded T/TA Performance Management Adjustment: Describe adjustments the state made to 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.

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

The State office is making minimal adjustments to this plan compared to the last state plan. Specific trainings are planned based on current trends and needs determined through monitoring, and the state association training and technical assistance survey conducted through the RPIC. The State office is working with the State Association, and R3PIC to coordinate technical assistance with the implementation of our joint TTA Plan. The State Association assesses training needs and works with the State Office to develop and coordinate training and technical assistance. The State Association utilizes a Learning Management System for assigning and tracking on-demand training opportunities.

Section 9: State Linkages and Communication

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

Form Approved
OMB No:0970-0382
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SECTION 9 State Linkages and Communication

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

9.1. State Linkages and Coordination at the State Level:

Describe the linkages and coordination at the state level that the state intends 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 additional information as needed.

Note: This response will link to the corresponding CSBG assurance, item 14.5. In addition, this item is associated with State Accountability Measure 7Sa andand pre-populates the Annual Report, Module 1, Item G.1.

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

State Energy Office, State Historic Preservation Office, WV Housing Development Fund, WV Community Action Partnership, Inc.

9.2. State Linkages and Coordination at the Local Level:

Describe how the state is encouraging partnerships and collaborations at the state level with public and private sector organizations, to assure the effective delivery and coordination of CSBG services to transform low-income communities and avoid duplication of services (as required by assurances under Sections 676(b)(5) - (6))

Note: This response will link to the corresponding CSBG assurances, items 14.5 and 14.6., and pre-populates the Annual Report, Module 1, Item G.2.

The State plans to create and maintain partnerships with governmental and other social services, especially antipoverty programs, to assure the effective delivery of and coordination of CSBG services to low income people and communities to avoid duplication of services (as required by assurances under Sections 676(b)(5) and (b)). The State maintains an active partnership with the West Virginia Community Action Partnership. The state office is an active member of the Workforce WV Interagency Collaborative Team, and has encouraged communication between local Workforce Investment Boards and CEEs to engage one another and execute formal MOUs for the provision of employment related training and support services across the state. The State also participates on an HMIS (Homeless Management Information System) steering committee made up of representatives from all four WV Continuums of Care, and a representative from the State CSBG/ESG office to promote collaboration and data sharing. The state office partners with the WV Office of Energy through their annual conference and periodic meetings, and plan to enhance this partnership as we work on the Weatherization Bipartisan Infrastructure Law program and the Energy Rebates Program. The state works closely with the WV Department of Human Resources which administers LIHEAP for WV. The primary focus of that collaboration is centered around collaboration on Weatherization and Repair and Replace through LIHEAP in WV. The primary focus of that collaboration is centered around provision of Weatherization services and emergency repair and replacement of systems heating systems for vulnerable citizens in WV. These program services are provided by WV CEEs. These existing partnerships/linkages require continuous effort to maintain. Maintaining partnerships and collaborations require ongoing work and dedication. These partnerships remain relevant in order to continue the effective delivery and coordination of CSBG services.

9.3. Eligible Entity Linkages and Coordination

9.3a. State Assurance of Eligible Entity Linkages and Coordination: Describe how the state will assure that eligible entities will partner and collaborate with public and private sector organizations to assure the effective delivery 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)).

Note: This response will link to the corresponding CSBG assurance, item 14.5.and pre-populates the Annual Report, Module 1, Item G.3a.

The State is committed to ensuring eligible entities effectively coordinate and establish connections to deliver CSBG services to low-income individuals and communities without duplication (per Section 676(b)(5) requirements). CSBG entities work in tandem with local service providers to streamline resources and address diverse client needs. They have set up robust information networks and service centers to cater to customer needs comprehensively. By collaborating with public and private partners, eligible entities offer a wide array of services. The State acknowledges the challenge of meeting this commitment and pledges to work with CEEs to enhance delivery methods. WV CEEs leverage statewide resources like the WV 2.1.1

referral system and regional networks to avoid redundancy. WV CEEs include a complete list of partners in their community action plans and leverage non-CSBG funds to address a full range of needs. The state network, through initiatives like the LITT Mobile App, is expanding service access for low-income individuals by enabling remote enrollment in programs. While efforts are made to streamline processes across state assistance programs, collaboration remains challenging due to varied data systems and procurement regulations. The CSBG State Office aims to facilitate coordination among state agencies and enhance data sharing to overcome these obstacles. Continuous efforts are made to update and manage information on available resources for low-income individuals, ensuring easy accessibility through the LITT Mobile App.

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., and pre-populates the Annual Report, Module 1, Item G.3b.

The eligible entities will establish connections to address identified service gaps by offering information, referrals, case management, and follow-up consultations as mandated by Section 676(b)(3)(B) of the CSBG Act. These interconnections, developed within the operational capacity of CEE programs, facilitate access for individuals and families to a range of local services and programs serving their needs. WV CEEs will submit a comprehensive CSBG Application detailing programs aiding low-income individuals and outlining follow-up procedures. CSBG funds provide support that enables CSBG eligible entities to operate an array of anti poverty and social service programs. Coordination of public and private funding takes place at the local level in a variety of ways suited to the individual community and available resources. CSBG eligible entity staff and/or administrators meet with other providers in the service area to determine how best to not duplicate services while providing the services needed to meet the emergency needs of low income persons and establishing/improving programs which assist low income individuals and families to transition out of poverty.

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. WIOA Combined Plan: 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. Employment and Training Activities: 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.

The State plans to continue its partnership with the WIOA office (Workforce WV) for 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. Under the WIOA program, WV law established an Interagency Collaborative Team (ICT) comprised of the mandated partners under WIOA. The State will continue participating in the Workforce ICT. Examples of other state partners participating in the ICT include the Bureau of Senior Services, the Division of Rehabilitation Services, Community Colleges, WV Department of Commerce, Education, etc. The State CSBG Office regularly shares updates on how CSBG programs can collaborate to enhance job opportunities and training initiatives in West Virginia. The Workforce ICT convenes every last Thursday monthly. The State office will persist in engaging partners, informing about CSBG initiatives, and disseminating relevant information to the CEE network. The State aims to integrate the WV Community Action Partnership and CEE representatives into the regular ICT meetings. Moreover, it will advocate for CEEs to play a more involved role in local WIOA offices. Additionally, the Workforce ICT conducts small group meetings on demand in addition to the monthly gatherings held on the last Thursday of each month.

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.

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). The State CSBG office is not the direct recipient of LIHEAP funding. The WV Department of Human Resources (DoHS) Low Income Home Energy Assistance Program (LIHEAP) allows West Virginia Weatherization Assistance Program Subrecipients the administration of an Energy Crisis Intervention Program (ECIP). The ECIP program is designed to aid households in need of emergency heat due to non existent, non operable, severely malfunctioning, unsafe, or severely inadequate heat during the winter months, from November 1 to March 15. The State office works with the WVDoHS to administer an additional program funded by LIHEAP called the Repair and Replacement Program, which is designed to respond to households with no heat, as well as situations where cooling would be a necessity for elderly, small children, and individuals with health related issues. The program is administered by CEEs in WV since the WV Department of Human Resources does not have a provider network capable of administering these services. The program has been very successful since 2015 and is provided by 14 of 15 WV CEEs. The program is funded at around \$6.3 million for FFY2025

9.6. 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.

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 States assurance under Section 676(b)(9) of the CSBG Act. CEEs are required to submit an application that includes a Community Action Plan. The plan must include information on how the CEE coordinates programs with and forms partnerships with other organizations serving low income residents of the communities, including religious organizations, charitable groups, and community organizations. The State reviews MOUs/partnership agreements during regular on site monitoring and review of the CSBG Organizational Standards. The State reviews the totals of partnership reported on the annual CSBG Report. Additionally, these partnerships are required by the CSBG Organizational Standards which serve as a continuous reminder of the requirement, which must be documented by CEEs.

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.

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. CSBG eligible entities operate within a network of local service providers to reduce duplication of effort and to

coordinate resources to address various client circumstances. CSBG eligible entities have developed extensive information and referral networks and/or one stop service centers to meet the many needs of the clients seeking services. Through linkages established within the service area individuals and families can be connected to an array of local programs and services to meet the needs of family members. Through the submission of annual Community Action Plans, each CEE identifies all additional funding sources planned to be utilized in the delivery of specific agency programs. The State office strives to encourage leveraging of additional funding sources to fill the gaps in services that are needed by low income individuals and families in our State.

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.

Note: This information will pre-populate the Annual Report, Module 1, Item G.5.

The State supports coordination among the eligible entities and the State Community Action Association by funding the Association with CSBG discretionary funding. The funding provides support for Community Action initiatives, training, software support, and administration. The association is the lead agency for ROMA training in the state. The State office provides program updates for all association board meetings. Coordination efforts include the support and management of the state's Learning Management System, ROMA NCRT/NCRI/NCRA coordination, and requirements of the state's data management software for CEEs CSBG and Weatherization. The State also supports the State Association conference each year through collaboration and financial support.

9.9. Communication with Eligible Entities and the State Community Action Association:

In the table below, detail how the state intends to communicate with eligible entities, the state community action association, and other partners identified under this State Plan on the topics listed below. For any topic that is not applicable, select "Not Applicable" under Expected Frequency.

Communication Plan			
Subject Matter	Expected Frequency	Format	Brief description of "Other"
Upcoming Public and/or Legislative Hearings	Biannual	Website	
State Plan Development	Quarterly	Meetings/Presentation	
Organizational Standards Progress	Biannual	Other	Official CSBG Monitoring Report
State Accountability Measures Progress	Annually	Other	Shared with CEEs via email and with the Public via State Office website in the format of the CSBG Annual Report.
Community Needs Assessments/Community Action Plans	Annually	Email	Community Needs Assessments are assessed biannually through regular CSBG Monitoring. Community Action Plans are reviewed annually with feedback provided via email and 1:1 meetings.
State Monitoring Plans and Policies	Annually	Other	CEEs are notified of tentative monitoring schedules each year. Monitoring notifications are sent via email at least 30 days prior to monitoring. Monitoring policies are available via state plan attachments and sent to CEEs via email.
Training and Technical Assistance (TTA) Plans	Semi-Annually	Other	The State meets with the State Association at least quarterly to prepare and then review progress on the joint TTA Plan which is developed annually. Information regarding planned TTA is disseminated to CEEs as needed.
ROMA and Performance Management	Quarterly	Other	The WV ROMA Task Force intends to meet quarterly. CSBG Annual Reports are required to be submitted in quarterly increments by CEEs to ensure regular review.
State Interagency Coordination	As needed	Other	Depending on the state partner, communication takes place in different formats and frequencies. For instance, the Workforce Interagency Collaborative Team meets monthly via webinar.
CSBG Legislative/Programmatic Updates	As needed	Email	
Tripartite Board Requirements			Learning Management

	Upon Request	Other	System in development for required board training. State policy on tripartite board requirements will be presented via webinar.
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9.10. Feedback to Eligible Entities and State Community Action Association:
Describe how the state will provide information 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). and will pre-populate the Annual Report, Module 1, Item G.6

The State will provide feedback to local entities and State Community Action Associations regarding performance on State Accountability Measures as part of quarterly CSBG eligible entity executive director meetings. The State will also share the CSBG Annual Report, which includes results of State Accountability Measures in Module 1.

9.11. Communication Plan Performance Management Adjustment:
Describe any adjustments the state made to 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.

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

The State will continue to make strides toward improving communication, with plans to provide more regular email communication across the board. The State will make regular training opportunities available and host CSBG virtual meetings with subrecipients at least quarterly. The State is evaluating its process of regular communication and working on continuous improvements.

Section 10: Monitoring, Corrective Action, and Fiscal Controls

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

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SECTION 10 Monitoring, Corrective Action, and Fiscal Controls

Monitoring, Corrective Action and Fiscal Controls (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.

Note: This information is associated with State Accountability Measure 4Sa(i); this response pre-populates the Annual Report, Module 1, Table H.1.

	CSBG Eligible Entity	Monitoring Type	Review Type	Target Quarter	Start Date of Last Full Onsite Review	End Date of Last Full Onsite Review	Brief Description of "Other"
1	Southwestern Community Action Council, Inc.	Full On-site	Onsite Review	FY1 Q4	08/06/2024	08/13/2024	
2	Nicholas Community Action Partnership, Inc.	Full On-site	Onsite Review	FY1 Q1	12/04/2023	12/06/2023	
3	Eastern West Virginia Community Action Agency, Inc.	Full On-site	Onsite Review	FY1 Q3	04/24/2024	04/25/2024	
4	Coalfield Community Action Partnership, Inc.	Full On-site	Onsite Review	FY1 Q2	01/29/2024	02/01/2024	
5	Community Action of South Eastern West Virginia, Inc.	Full On-site	Onsite Review	FY1 Q3	02/20/2024	02/21/2024	
6	Mountainheart Community Services, Inc.	Full On-site	Onsite Review	FY1 Q4	07/08/2024	07/09/2024	
7	Change, Incorporated	Full On-site	Onsite Review	FY1 Q2	01/08/2024	01/10/2024	
	CSBG Eligible Entity	Monitoring Type	Review Type	Target Quarter	Start Date of Last Full Onsite Review	End Date of Last Full Onsite Review	Brief Description of "Other"
1	North Central West Virginia Community Action Association, Inc.	Full On-site	Onsite Review	FY2 Q4	04/17/2023	04/27/2023	
2	PRIDE Community Services, Inc.	Full On-site	Onsite Review	FY2 Q1	11/18/2024	11/21/2024	
3	Community Resources, Inc.	Full On-site	Onsite Review	FY2 Q3	05/12/2025	06/30/2025	
4	Mountain CAP of West Virginia Inc	Full On-site	Onsite Review	FY2 Q2	01/28/2025	02/25/2025	
5	Central West Virginia Community Action Association, Inc.	Full On-site	Onsite Review	FY2 Q1	10/07/2024	10/30/2024	
6	Raleigh County Community Action Association, Inc.	Full On-site	Onsite Review	FY2 Q4	07/15/2025	08/15/2025	
7	Telamon Corporation	Full On-site	Onsite Review	FY2 Q2	03/17/2025	03/19/2025	
8	Council of the Southern Mountains, Inc.	Full On-site	Onsite Review	FY2 Q3	06/23/2025	07/14/2025	

10.2. Monitoring Policies:

Provide a copy of state monitoring policies and procedures by attaching and/or providing a hyperlink.

See attached

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.

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

10.4. Closing Findings:

Are state procedures for addressing eligible entity findings/deficiencies and documenting the closure of findings, included in the State monitoring protocols attached above? ☒ Yes ☐ No

<p>10.4a. Closing Findings Procedures: If no describe state procedures for addressing eligible entity findings/deficiencies, and documenting the closure of findings.</p>
<p>10.5. Quality Improvement Plans (QIPs): Provide the number of eligible entities currently on QIPs, if applicable.</p>
<p><i>Note: The QIP information is associated with State Accountability Measures 4Sc.</i></p>
<p>0</p>
<p>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</p>
<p><i>Note: This item is associated with State Accountability Measures 4Sa(iii).</i></p>
<p>The State CSBG Program manager will notify the regional OCS representative of the QIP by email within 30 days of approving a QIP. The State will provide a copy of the QIP to the representative and provide additional information if requested.</p>
<p>10.7. Assurance on Funding Reduction or Termination: The state assures, "that any eligible entity that received CSBG funding the previous fiscal year will not have its funding terminated or reduced below the proportional share of funding the entity received in the previous fiscal year unless, after providing notice and an opportunity for a hearing on the record, the State determines that cause exists for such termination or such reduction, subject to review by the Secretary as provided in Section 678C(b)" per Section 676(b)(8). <input checked="" type="radio"/> Yes <input type="radio"/> No</p>
<p><i>Note: This response will link with the corresponding assurance under item 14.8.</i></p>
<p align="center">Policies on Eligible Entity Designation, De-designation, and Re-designation</p>
<p>10.8. Eligible Entity Designation: Do the State CSBG statute and/or regulations provide for the designation of new eligible entities? <input checked="" type="radio"/> Yes <input type="radio"/> No</p>
<p>10.8a. New Designation Citation: If yes, provide the citation(s) of the law and/or regulation.</p>
<p>See attached. WV CSBG Policy on Eligible Entity Designation and Re-designation is attached with Monitoring Policies in cell 10.2</p>
<p>10.8b. New Designation Procedures: If no, describe state procedures for the designation of new eligible entities and how the procedures were made available to eligible entities and the public</p>
<p>10.9. Eligible Entity Termination: Do State CSBG statute and/or regulations provide for termination of eligible entities <input checked="" type="radio"/> Yes <input type="radio"/> No</p>
<p>10.9a. Termination Citation: If yes, provide the citation(s) of the law and/or regulation.</p>
<p>See attached. WV CSBG Policy on Monitoring, Corrective Action, and De-designation is attached in cell 10.2</p>
<p>10.9b. Termination Procedures: If no, describe state procedures for termination of new eligible entities and how the procedures were made available to eligible entities and the public</p>
<p>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? <input checked="" type="radio"/> Yes <input type="radio"/> No</p>
<p>10.10a. If Yes, provide the citation(s) of the law and/or regulation.</p>
<p>See attached. WV CSBG Policy on Eligible Entity Designation and Re-designation is attached with Monitoring Policies in cell 10.2</p>
<p>10.10b. If No, describe State procedures for re-designation of existing eligible entities.</p>
<p align="center">Fiscal Controls and Audits and Cooperation Assurance</p>
<p>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).</p>
<p>The State has established appropriate fiscal controls and accounting procedures that permit the accurate and timely preparation of the SF-425. Multiple reports are run from the States accounting system (wvOasis). The information contained in these reports is used to prepare an initial SF-425. The SF-425 is then reconciled and reviewed before submission. Additionally, WVDO ensures staff possesses the required skills and knowledge necessary to prepare the SF-425. The CSBG Program Manager maintains an operational calendar with report deadlines and will work with fiscal staff to ensure the reports are submitted in a timely manner. To permit the tracking 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 96361(a), the State conducts bi-annual Comprehensive Monitoring of eligible entities during which reported eligible entity expenditures are tested for allowability and internal controls and financial management systems are assessed.</p>
<p>10.12. Single Audit Management Decisions: Describe state procedures for issuing management decisions for eligible entity single audits, as required by Block Grant regulations applicable to CSBG at 45 CFR 75.521.</p>
<p><i>Note: This information is associated with State Accountability Measure 4Sd.</i></p>
<p>Standard Review Procedures for Subrecipients Subject to Single Audit Act Subrecipient audits are due within the earlier of 30 calendar days after the issuance of the audit report or 9 months after the subrecipients fiscal year end. While there is no Federal regulatory deadline for the review of Single Audits if no management decision is required (see Management Decisions) this review process should generally be completed within 60 days of receipt of the audit, barring any unforeseen or unusual circumstances. The review process outlined below should be followed for all subrecipients that are subject to the Single Audit Act. I. Retrieving Single Audits from the Federal Audit Clearinghouse. The Federal Audit Clearinghouse (FAC) is the official repository for all audits conducted under the Single Audit Act. The website for the FAC is currently here: https://harvester.census.gov/facdissem/Main.aspx The Federal Audit Clearinghouse should be checked at least monthly for any new subrecipient audit submissions. The audit review log (attachment A) lists due dates of when audit reports should be uploaded to the FAC based on the subrecipients fiscal year. State staff will utilize the Subrecipient Audit Review Checklist when reviewing audits. The checklist is designed to test the completeness and correctness of the audit package, including the qualifications of the CPA firm, and required reporting to the Federal Audit Clearinghouse. Management decisions are required when: (a) A subrecipients audit discloses a federal award finding related to a program that the State Office administers. (b) A subrecipients audit discloses a federal award finding not related to a program that the State Office administers but the finding is related to a compliance requirement of one of the State Office's programs. To</p>

determine whether a federal award finding is related to a compliance requirement of one of the State Office's programs, please see Appendix XI to Part 200 Compliance Supplement, which lists compliance requirements by CFDA numbers. Management decisions may be issued at the State Office's discretion when: (a) A subrecipients audit discloses a Federal award finding not related to a program that the State Office administers and the finding is not related to a compliance requirement of one of the State Office's programs (b) A subrecipients audit disclosed a financial statement finding if the State Office issues a management decision when it is not required, the management decision must clearly include a justification as to why a management decision is being issued. Generally, the State Office will issue a management decision when not required only if the audit finding has cross-cutting effects and has the potential to affect the State Office's programs. The State Office may request additional information and documentation from a subrecipient regarding audit findings before determining if a management decision will be issued and the type of management decision to be issued. If a management decision is to be issued, it must contain the following as applicable: (a) Reference numbers the subrecipients auditor assigned to each audit finding (b) Whether or not the audit finding is sustained (c) The reason(s) for the decision (d) Expected subrecipient follow-up i. Repayment of disallowed costs, if applicable ii. Making financial adjustments, if applicable iii. Other actions to be taken (e) Timetable for follow-up if corrective actions have not been completed (f) Description of the appeals process available to the subrecipient See attachment C for a template form letter to be used when issuing management decisions. All management decisions will be signed by the State Office's director. Management decisions must be issued within 6 months of the acceptance of the subrecipients audit report by the FAC.

10.13. Assurance on Federal Investigations:

The state will "permit and cooperate with Federal investigations undertaken in accordance with Section 678D" of the CSBG Act, as required by the assurance under Section 676(b)(7) of the CSBG Act. ☒ Yes ☐ No

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

10.13a. Federal Investigations Policies: Are state procedures for permitting and cooperating with federal investigations included in the state monitoring policies attached under 10.2? ☐ Yes ☒ No

10.13b. Closing Findings Procedures: If no, describe state procedures for permitting and cooperating with federal investigations.

CSBG Programmatic Assurances including "To permit and cooperate with federal investigations undertaken in accordance with section 678D of the Act; [676(b)(7)]" are included in the CSBG Subgrant Agreement with CEEs.

10.14. Monitoring Procedures Performance Management Adjustment:

Describe any adjustments the state made to 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.

West Virginia was monitored by OCS in November 2023. The monitoring identified three opportunities for improvement in programmatic operations related to the annual report, one opportunity for improvement in administrative operations related to quality improvement plans for subrecipients, and two issues of noncompliance which were resolved by implementing policies and procedures on "Eligible Entity Designation and Redesignation" and a policy on the "Use of Funds for Construction and Waiver Request Procedures". The State office has modified the format of CSBG monitoring reports to align with the format of the federal monitoring report received from the Office of Community Services. The modified format provides more context of the monitoring and more detailed information that can be used by the Subrecipient to make improvements. The CSBG Monitoring policies were expanded to clarify and include specific procedures for corrective action and termination. Additional procedures were implemented in FY2025 on CEE Designation and Re-designation. Despite the clarification of policy and procedure, there were no significant changes in the way monitoring has been performed during the last program period other than an increased focus on the intent of the purposes of the CSBG Act. The State received positive feedback on monitoring activities in the recent ACSI survey of WV CEEs, and intends to continue implementation with an emphasis on quality improvement and communication of opportunities for improvement.

Section 11: Eligible Entity Tripartite Board

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

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SECTION 11 Eligible Entity Tripartite Board

11.1. Tripartite Board Verification: Verify which of the following measures are taken to ensure that the state verifies CSBG Eligible Entities are meeting Tripartite Board requirements under Section 676B(a)(2) of the CSBG Act[*Check all that applies and narrative where applicable*]

☐

Attend Board meetings

☒

Organizational Standards Assessment

☒

Monitoring

☒

Review copies of Board meeting minutes

☒

Track Board vacancies/composition

☒

Other The State verifies CSBG Eligible Entities are meeting Tripartite Board requirements under Section 676B of the CSBG Act. The State will review copies of Board meeting minutes, track Board vacancies/composition, and review bylaws to ensure that the procedures for filling board positions meet the requirement and intent of the CSBG Act. Eligible entities are required to include Board documents, member info, and meeting documentation in the statewide data system that is reviewed in conjunction with regular on site monitoring and in conjunction with training. The State Office will conduct regular desk reviews of board compliance and notify CEEs by email of any vacancies, missing minutes, etc.

11.2. Tripartite Board Updates: Provide how often the state require eligible entities (which are not on TAPs or QIPs) to provide updates regarding their Tripartite Boards. This includes but is not limited to copies of meeting minutes, vacancy alerts, changes to bylaws, low-income member selection process, etc., [*Select one and narrative where applicable*]

☐

Annually

☐

Semiannually

☐

Quarterly

☐

Monthly

☒

As it Occurs

☐

Other

11.3. Tripartite Board Representation Assurance: Describe how the state will verify that eligible entities have policies and procedures by which individuals or organizations can petition for adequate representation on an eligible entity's Tripartite Board as required by the assurance under Section 676(b)(10) of the CSBG Act

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

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. The State will review the eligible entities policies and procedures during regular on site monitoring. This assurance is included as part of the programmatic assurances the CEE agrees to in the grant agreement.

11.4. Tripartite Board Alternative Representation: 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 participating 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. Tripartite Board Alternative Mechanism: If yes, describe the mechanism used by public eligible entities as an alternative to a Tripartite Board.

Section 12: Individual and Community Eligibility Requirements

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Community Services Block Grant (CSBG)

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SECTION 12 Individual and Community Income Eligibility Requirements

12.1. Required Income Eligibility:

Provide the income eligibility threshold for services in the state.

[Check one item below.]

☐ 125% of the HHS poverty line ☒ X% of the HHS poverty line (fill in the threshold) ☐ Varies by eligible entity

200% % *[Response Option: numeric field]*

12.1a. Income Eligibility Policy and Procedures: Describe any state policy and/or procedures for income eligibility, such as treatment of income and family/household composition.

Section 673(2) of the CSBG Act (42 USC 9902(2)) specifies that the Federal Poverty Line shall be used as a criterion of eligibility for the CSBG and that the state may revise the poverty line to not exceed 125 percent of the official poverty line. As authorized by the CARES Act, the WVDED revised the income limit for eligibility ceiling from 125 to 200 percent of the federal poverty level for CSBG services, including services provided with the states regular CSBG appropriations since that time. The State of West Virginia authorizes eligible entities to utilize 200 percent of the federal poverty guideline for CSBG services so long as it is authorized by the federal award. In the event the federal award does not allow for using 200 percent of the poverty guidelines, eligible entities will revert back to the CSBG Act guidelines of 125 percent. Eligible entities should use the most current HHS poverty guidelines when assessing income eligibility. The current guidelines are published in the Federal Register and are available on the HHS website at www.hhs.gov. The most recent guidelines are also used for calculation of household percent of poverty in the states data management system. The guidelines are calculated on a sliding scale based on the number of persons in a clients family. To calculate 200% of the federal poverty line, use the amount stated in the poverty guidelines relating to the number of persons in the clients household and multiply that number by 2. An eligible entity may, consistent with its most recent community needs assessment, give priority in providing CSBG services/benefits to clients of lower income levels within the CSBG income eligibility limit established by the state. WV CSBG Policy on Determining Customer Eligibility is attached for reference.

12.2. Income Eligibility for General/Short-Term Services:

Describe how the state ensures eligible entities generally verify income eligibility for those services with limited in-take procedures (where individual income verification is not possible or practical).An example of these services is emergency food assistance.

The State has not yet addressed this in policy but plans to revise the WV CSBG Policy on Determining Customer Eligibility to address it in FY2026 and implement in FY2027.

12.3. Community-targeted Services: Describe how the state ensures eligible entities' services target and benefit low-income communities for services that provide a community-wide benefit (e.g., development of community assets/facilities, building partnerships with other organizations).

The State does not plan to address this in policy

Section 13: Results Oriented Management and Accountability (ROMA) System

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SECTION 13 Results Oriented Management and Accountability (ROMA) System

13.1. Performance Measurement System:

Identify the performance measurement system that the state and all eligible entities use, 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. and will pre-populate the Annual Report, Module 1, Item I.1.

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

13.1a. ROMA Description: If ROMA was chosen in Item 13.1, describe the state's written policies, procedures, or guidance documents on ROMA.

The Performance Management Framework includes: 1) Organizational standards for local CSBG eligible entities; 2) Accountability measures for states and OCS; 3) Results Oriented Management and Accountability (Next Generation); and 4) The CSBG Annual Report, which includes an updated and refined set of CSBG outcome measures. These elements are designed to increase accountability across all three levels of the network (Federal, State and local) and to enable program administrators at all levels to make better program decisions based on data. WV CEEs certify that all activities carried out with funds provided under the CSBG Grant Agreement shall report on the national Results Oriented Management and Accountability (ROMA) goals and national performance indicators. The ROMA System is woven into the entire design of the CSBG program in WV; from submission of annual grant applications by CEEs, to consistent data entry, documentation of services and outcomes, and regular reporting along the way. The State is partnering with the WV Community Action Partnership to lead the WV ROMA Task Force designated to guide the direction of ROMA implementation among WV CSBG eligible entities (CEEs). The Task Force is made up of Nationally Certified ROMA Trainers (NCRTs) and Nationally Certified ROMA Implementers (NCRIs), and ROMA Advocates (NCRAs). Currently, 14 of 15 CEEs are represented on the Task Force. The State office has 1 NCRA and the Association has 1 NCRA that work together to coordinate the activities and training of the WV ROMA Task Force.

13.1b. Alternative System Description: If an alternative system was chosen in Item 13.1, describe the system the state will use for performance measurement.

13.2. Outcome Measures: 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. Eligible Entity Support: Describe how the state supports the eligible entities in using the ROMA 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.

The State supports the eligible entities in using the ROMA system by having 1 certified ROMA advocate on staff to provide technical assistance as needed and guide policy making decisions to align with ROMA principles. The State plans to add a Nationally Certified ROMA Implementer or Trainer in 2027. The State utilizes a portion of the 5% CSBG discretionary funding to provide a statewide data management system to the network that has been designed to function within the ROMA system; including the use of Logic Models, Scales and Matrices, tracking of services and results, planning and evaluation tools. The State provides regular training on the use of the data management system. The State has also established a ROMA task force in cooperation with the WV Community Action Partnership that focuses on improving the ROMA system in the state for all CEEs and guiding state policy for promoting results orientation.

13.4. Eligible Entity Use of Data:

Describe how is the state plan to validate the eligible entities that are using data to improve service delivery?

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

As part of the CSBG Application for funding, a Community Action Plan is submitted that requires CEEs to report on their programs and where improvements need to be made. This is in coordination with submission of ROMA Logic Models that provide data which is critical to a plan for improvement. The State mandates the use of an electronic statewide data management and reporting system that is a critical resource of data. The system is equipped to produce regular grant reporting as well as ad hoc reporting of any data point entered the system. The State Association provided training through the National Community Action Partnership on Data Capacity Building to promote a data culture focused on quality improvement. The State has implemented additional changes to the state data management system that will allow for more precise and specific feedback on individual CSBG Annual Report submissions including the comparison to prior year data similar to the SmartForms as well as show warnings and errors that will produce data cleaning prior to submission. Our greatest challenge is unduplicating customer data resulting from multiple data systems being required by multiple funding sources.

Community Action Plans and Needs Assessments

13.5. Community Action Plan: Describe how the state will secure a Community Action Plan from each eligible entity, as a condition of receipt of

<p>CSBG funding by each entity, as required by Section 676(b)(11) of the CSBG Act.</p>
<p><i>Note: this response will link to the corresponding assurance, Item 14.11.</i></p>
<p>The State will receive a Community Action Plan from each eligible entity as required by Section 676(b)(11) of the CSBG Act. A Community Action Plan is required as part of the annual application for funding. The State has developed a template that CEEs use to present their plan. To satisfy this requirement, the State requires detailed information on each eligible entity program/initiative that meets the service delivery goals of the entity and the Community Services Block Grant assurances. CEEs are required to complete the following outline for each program/initiative. 1. Agency Program Name: A. Primary Funding: Includes the primary source of funds dedicated to the program and the amount. B. CSBG funding: Includes the amount of new grant year CSBG funds, carryover CSBG funds, and CARES Act funds allocated to the program. C. Additional funding: Includes any additional funding sources dedicated to the program and the amount allocated for each source. D. Projected # of Participants: Includes the number of participants expected to enroll in the program. E. CSBG Service Category: Employment Education Income Mgt. Health Housing Linkages Emergency Services Nutrition Self Sufficiency Other F. Demographic Category: Youth Senior N/A G. Counties Served: Includes each county served by this program. H. Eligibility Requirements: Includes the eligibility requirements for participants to receive services? (Example: Household income required to be less than 125% of poverty; household cannot receive greater than \$100 in emergency assistance per year, etc.) I. Narrative response to determine if the program addresses a need identified in the entity's most recent Community Assessment? Includes why the agency is providing this program to the community. If the need was not identified in the recent Community Assessment, an explanation is required. J. Includes the goals of the program/initiative? If this is a recurring program, explains how the goals of the previous program year were or were not met. K. If the goals were not met, the plan includes the entity's plans to ensure that goals are met for the plan year? L. Includes any organizations the entity is partnering with to provide the services and includes the primary focus of the partnership and whether a formal agreement exists. Each Individual/Family level program also requires the completion of a ROMA Logic Model. These items are submitted by each CEE and reviewed by the State Office</p>
<p>13.6. Community Needs Assessment: 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.</p>
<p><i>Note: this response will link to the corresponding assurance, Item 14.11.</i></p>
<p>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. The State requires the submission of a Certification of Needs Assessment form as part of the application for CSBG funding to ensure that the assessment has been completed as well as the method of doing so. The full assessment is reviewed during regular comprehensive monitoring of the CEE and through review of the CSBG Organizational Standards.</p>

Section 14: CSBG Programmatic Assurances and Information Narrative

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Community Services Block Grant (CSBG)

Form Approved
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SECTION 14 CSBG Programmatic Assurance and Information Narrative (Section 676(b) of the CSBG Act)

14.1 Use of Funds Supporting Local Activities

CSBG Services

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

(A) to support activities that are designed to assist low-income families and individuals, including families and individuals receiving assistance under title IV of the Social Security Act, homeless families and individuals, migrant or seasonal farm workers, and elderly low-income individuals and families, and a description of how such activities will enable the families and individuals--

- (i) to remove obstacles and solve problems that block the achievement of self sufficiency (particularly for families and individuals who are attempting to transition off a State program carried out under part A of title IV of the Social Security Act);
- (ii) to secure and retain meaningful employment;
- (iii) to attain an adequate education with particular attention toward improving literacy skills of the low-income families in the community, which may include family literacy initiatives;
- (iv) to make better use of available income;
- (v) to obtain and maintain adequate housing and a suitable living environment;
- (vi) to obtain emergency assistance through loans, grants, or other means to meet immediate and urgent individual and family needs;
- (vii) to achieve greater participation in the affairs of the communities involved, including the development of public and private grassroots partnerships with local law enforcement agencies, local housing authorities, private foundations, and other public and private partners to -
 - (I) document best practices based on successful grassroots intervention in urban areas, to develop methodologies for widespread replication; and
 - (II) strengthen and improve relationships with local law enforcement agencies, which may include participation in activities such as neighborhood or community policing efforts;

The State reviews eligible entities' annual grant applications to assure "that funds made available through grant or allotment will be used for the purpose outlined in 675(b)(1)(A). Where entities are not providing direct services, they are to explain how they partner with other providers in the community to meet the need through programs "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." Each CEE provides a unique and individualized approach to using CSBG funds for this purpose.

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;

The State reviews eligible entities' annual grant applications to assure "that funds made available through grant or allotment will be used for the purpose outlines in 676(b)(1)(B). Where entities are not providing direct services, they are to explain how they partner with other providers in the community to meet the need through program "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 pro grams that have demonstrated success in preventing or reducing youth crime." Each CEE provides a unique and individualized approach to using CSBG funds for this purpose.

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)

The State reviews eligible entities' annual grant applications to assure that support activities are designed to meet the requirement outlined in section 676(b)(1)(C) of the CSBG Act, which includes making more effective use of, and to coordinate with, other programs related to the purposes of this

<p>subtitle (including state welfare reform efforts). Each CEE provides a unique and individualized approach to using CSBG funds for this purpose.</p>
<p align="center">State Use of Discretionary Funds</p>
<p>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."</p>
<p><i>Note: The State describes this assurance under "State Use of Funds: Remainder/Discretionary," items 7.9 and 7.10</i></p>
<p align="center">Eligible Entity Service Delivery, Coordination, and Innovation</p>
<p>14.3. 676(b)(3) "Based on information provided by eligible entities in the state, a description of..."</p>
<p>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;</p>
<p>WV CEEs are required by the State to utilize a central data management system in which applicants are verified and unduplicated. The system allows customers of community action to be transferred seamlessly from CEE to CEE without interruption to services and determine eligibility for each agency program based on measurable criteria. The data management system provides the tools and resources to deliver services across the entire state and also serves as a powerful referral tool for resources outside of community action when needed. Each eligible entity in West Virginia describes their specific approach to service delivery in their annual CSBG application through the completion of a comprehensive Community Action Plan along with supporting ROMA logic models. Each entity has the ability to tailor their service delivery system to the needs of the local community.</p>
<p align="center">Eligible Entity Linkages - Approach to Filling Service Gaps</p>
<p>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."</p>
<p><i>Note: The state describes this assurance in the state linkages and communication section, item 9.3b.</i></p>
<p>The eligible entities will establish connections to address identified service gaps by offering information, referrals, case management, and follow-up consultations as mandated by Section 676(b)(3)(B) of the CSBG Act. These interconnections, developed within the operational capacity of CEE programs, facilitate access for individuals and families to a range of local services and programs serving their needs. WV CEEs will submit a comprehensive CSBG Application detailing programs aiding low-income individuals and outlining follow-up procedures. CSBG funds provide support that enables CSBG eligible entities to operate an array of anti poverty and social service programs. Coordination of public and private funding takes place at the local level in a variety of ways suited to the individual community and available resources. CSBG eligible entity staff and/or administrators meet with other providers in the service area to determine how best to not duplicate services while providing the services needed to meet the emergency needs of low income persons and establishing/improving programs which assist low income individuals and families to transition out of poverty.</p>
<p align="center">Coordination of Eligible Entity Allocation 90 Percent Funds with Public/Private Resources</p>
<p>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."</p>
<p><i>Note: The state describes this assurance in the state linkages and communication section, item 9.7.</i></p>
<p>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. CSBG eligible entities operate within a network of local service providers to reduce duplication of effort and to coordinate resources to address various client circumstances. CSBG eligible entities have developed extensive information and referral networks and/or one stop service centers to meet the many needs of the clients seeking services. Through linkages established within the service area individuals and families can be connected to an array of local programs and services to meet the needs of family members. Through the submission of annual Community Action Plans, each CEE identifies all additional funding sources planned to be utilized in the delivery of specific agency programs. The State office strives to encourage leveraging of additional funding sources to fill the gaps in services that are needed by low income individuals and families in our State.</p>
<p align="center">Eligible Entity Innovative Community and Neighborhood Initiatives, Including Fatherhood/Parental Responsibility</p>
<p>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."</p>
<p><i>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).</i></p>
<p>The State reviews eligible entities annual grant applications to assure that the local entity will use the funds [made available under 675C(a)] to support innovative community and neighborhood based initiatives related to the purposes of this subtitle. Where entities are not providing direct services, they are to explain how they partner with other providers in the community to meet the need through programs "which may include fatherhood initiatives and other initiatives with the goal of strengthening families and encouraging parenting. Each CEE provides a unique and individualized approach to using CSBG funds for this purpose. Specific programs provided by CEEs in the state that have a goal of strengthening families and encouraging parenting include: 1 CEE provides the Birth to Three program 2 CEEs provide parenting support programs 4 CEEs provide Right from the Start program 6 CEEs provide Early Head Start program 9 CEEs provide Head Start, which includes a specific focus area on fatherhood/parental responsibility. Several CEEs partner with WV's Family Resource Networks across the state to provide resources for parents including hosting an annual Community Baby Shower, through which community partners come together to support and strengthen families with supplies and information needed by families with babies.</p>
<p align="center">Eligible Entity Emergency Food and Nutrition Services</p>

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."

The State reviews eligible entities annual CSBG applications to assure that 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. Where entities are not providing direct services, they are to explain how they partner with other providers in the community to meet the need "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." Each CEE provides a unique and individualized approach to using CSBG funds for this purpose.

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

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

Note: The state describes this assurance in the state linkages and communication section, items 9.2 and 9.5.

Federal Investigations

14.7. 676(b)(7) Provide "an assurance that the state will permit and cooperate with Federal investigations undertaken in accordance with section 678D." Yes

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

Funding Reduction or Termination

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

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

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

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

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

Eligible Entity Tripartite Board Representation

14.10. 676(b)(10) Describe how "the state will require each eligible entity in the state to establish procedures under which a low-income individual, community organization, or religious organization, or representative of low-income individuals that considers its organization, or low-income individuals, to be inadequately represented on the board (or other mechanism) of the eligible entity to petition for adequate representation."

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

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. The State will review the eligible entities policies and procedures during regular on site monitoring. This assurance is included as part of the programmatic assurances the CEE agrees to in the grant agreement.

Eligible Entity Community Action Plans and Community Needs Assessments

14.11. 676(b)(11) Provide "an assurance that the state will secure from each eligible entity in the 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."

Note: The state describes this assurance in the ROMA section, items 13.5 and 13.6.

State and Eligible Entity Performance Measurement: ROMA or Alternate system

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

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

Validation for CSBG Eligible Entity Programmatic Narrative Sections

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

Note: The 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.

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

Section 15: Federal Certifications

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

Form Approved
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SECTION 15 Federal Certifications

15.1. 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.

15.2. 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).

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.

15.3. 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.

15.4. CERTIFICATION REGARDING ENVIRONMENTAL TOBACCO SMOKE

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

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

15.4. Environmental Tobacco Smoke


After assurance select a check box:



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

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.

 WEST VIRGINIA Economic Development	<u>CSBG Policies & Procedures</u> Customer Eligibility & Documentation	Effective Date: 10/1/2024
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SUBJECT: CSBG Customer Eligibility & Documentation

PURPOSE:

The West Virginia Department of Economic Development (WVDED) is committed to providing guidance to assist subrecipients in meeting the expectations and intent of the CSBG Act. This policy is intended to provide a description of the procedures for determining eligibility for customers assisted with CSBG funds. If any information is needed that is not provided in this policy, please submit a request to the CSBG Program Manager for additional information.

POLICY:


Section 673(2) of the CSBG Act (42 USC 9902(2)) specifies that the Federal Poverty Line shall be used as a criterion of eligibility for the CSBG and that the state may revise the poverty line to not exceed 125 percent of the official poverty line. As authorized by the CARES Act, the WVDED revised the income limit for eligibility ceiling from 125 to 200 percent of the federal poverty level for CSBG services, including services provided with the state's regular CSBG appropriations since that time. The State of West Virginia authorizes eligible entities to utilize 200 percent of the federal poverty guideline for CSBG services so long as it is authorized by the federal award. In the event the federal award does not allow for using 200 percent of the poverty guidelines, eligible entities will revert back to the CSBG Act guidelines of 125 percent.

Eligible entities should use the most current HHS poverty guidelines when assessing income eligibility. The current guidelines are published in the Federal Register and are available on the HHS website at www.hhs.gov. The most recent guidelines are also used for calculation of household percent of poverty in the state's data management system.

The guidelines are calculated on a sliding scale based on the number of persons in a client's family. To calculate 200% of the federal poverty line, use the amount stated in the poverty guidelines relating to the number of persons in the client's household and multiply that number by 2.

An eligible entity may, consistent with its most recent community needs assessment, give priority in providing CSBG services/benefits to clients of lower income levels within the CSBG income eligibility limit established by the state.

Supersedes: CSBG WV IM 2024-01	WVDED CSBG Policies and Procedures
The WV DED electronic version is the control version. All other printed or electronic versions are uncontrolled.	

 WEST VIRGINIA Economic Development	<u>CSBG Policies & Procedures</u> Customer Eligibility & Documentation	Effective Date: 10/1/2024
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PROCEDURES:

The federal CSBG law does not require a specific process for determining client eligibility; nor do HHS regulations. However, in order to ensure that CSBG funds are being used for income eligible clients, eligible entities must screen for income eligibility.

Definition of Family/Household:

For purposes of determining income eligibility, the term “persons in family” in the HHS poverty guidelines means persons in a household. A household includes any individual or group of individuals who are living together as one economic unit. The income of each individual in the household who is 18 years old or older must be included in determining income eligibility. In determining whether an individual is part of a household, the eligible entity may consider factors such as whether the individual pays for his/her own food and occupancy.

Determining Income:


Neither the HHS poverty guidelines nor the federal CSBG Act nor applicable HHS regulations define the term “income.” Following is one example of how the term income might be defined. Other reasonable definitions are also acceptable.

Income includes total annual cash receipts before taxes from all sources, with the exceptions noted below.

Income includes:

- Wages and salaries before any deductions;
- Net receipts from non farm self-employment (receipts from a person’s own unincorporated business, professional enterprise, or partnership, after deductions for business expenses);
- Net receipts from farm self-employment (receipts from a farm which one operates as an owner, renter, or sharecropper, after deductions for farm operating expenses);
- Regular payments from Social Security, railroad retirement, unemployment compensation, strike benefits from union funds, workers’ compensation, veterans’ payments, public assistance (including Temporary Assistance for Needy Families, Supplemental Security Income, and non-federally-funded General Assistance or General Relief money payments), and training stipends;
- Alimony, child support, and military family allotments or other regular support from an absent family member or someone not living in the household;

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 WEST VIRGINIA Economic Development	<u>CSBG Policies & Procedures</u> Customer Eligibility & Documentation	Effective Date: 10/1/2024
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- Private pensions, government employee pensions (including military retirement pay) and regular insurance or annuity payments;
- College or university scholarships, grants, fellowships, and assistantships;
- Dividends, interest, net rental income, net royalties;
- Periodic receipts from estates or trusts, and
- Net gambling or lottery winnings.
- Income does not include:
- Coronavirus stimulus payments;
- Tax refunds;
- Assets drawn down as withdrawals from a bank or the sale of property (such as a house or a car);
- Capital gains;
- Gifts, loans, lump-sum inheritances, one-time insurance payments, or compensation for injury;
- Employer-paid or union-paid portion of health insurance or other employee fringe benefits;
- Food or housing received in lieu of wages;
- Federal or state non cash benefit programs as Medicare, Medicaid, food stamps, school lunches, and housing assistance; or
- Payments required under federal or state law to be excluded from the definition of income for calculating eligibility for federal or state public benefit programs, such as cost reimbursements under the federal Foster Grandparent program (see 45 C.F.R. § 2552.47)

Period to be Used for Determining Income:

There is no prescribed look-back period for income assessment. Depending on an individual client's circumstances and the documentation available, it may be reasonable to calculate client income based upon the household's gross income in the past 30 days (multiplied by 12) or based upon a review of the past year. (For example, if a client has become unemployed or was the victim of domestic violence and has left the abusive household within the past year, it may be inaccurate to use the data of the past year to assess income, and the use of a shorter period of time—perhaps several months—may be a more appropriate and accurate assessment of the client's income. In addition, case-by-case circumstances such as seasonal employment or an isolated and temporary spike or decline in earnings may require an eligible entity to exercise reasonable discretion to determine on a case-by-case basis the most appropriate time period to review to most appropriately and accurately assess income). It is recommended that no time period shorter than the past 30 days or longer than the past year should be used, however. In exercising this reasonable discretion, the eligible entity's goal in each case should be to most accurately determine a client's actual financial position at the time of assessment.

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 WEST VIRGINIA Economic Development	<u>CSBG Policies & Procedures</u> Customer Eligibility & Documentation	Effective Date: 10/1/2024
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Redetermination of Income:

After initial determination, the income level of a client receiving ongoing services should be re-determined at least annually and should be reviewed any time the eligible entity becomes aware of a significant income changing event or circumstance. An eligible entity retains the right to review a client's income level at any time while the client is receiving CSBG-funded benefits/services for the purpose of determining continued program eligibility.

Verification of Income:


Before an applicant is determined to be eligible based on household income, the applicant must submit information to the program concerning the family's income. Verification must include examination of documents such as individual income tax forms, W-2 forms, pay stubs, pay envelopes, or written statements from employers (if individual income tax forms, W-2 forms, pay stubs, or pay envelopes are not available). All income sources must be verified.

Applicants who claim no household income must sign a form attesting to that fact and to the accuracy of the information provided to the eligible entity. This form must also be signed by a staff member indicating that the staff member has, in good faith, attempted to verify this condition, and that the information on eligibility in the file is accurate to the best of the staff member's knowledge.

When appropriate, in cases in which no documentation regarding the income eligibility of the applicant has been received by the eligible entity, or when it is either more efficient or reliable to do so rather than to search for eligibility documentation, eligible entities may seek information from third parties who have first-hand knowledge about the applicant's eligibility, and document each such third party's name, title, organizational affiliation (if any) and relationship to the applicant in the applicant's record. Eligible entities also may seek third party information in cases where documents are not submitted to prove a claim that an applicant has no income.

If eligible entities plan to seek third party verification from one or more parties regarding an applicant's eligibility, staff must inform the applicant about each party that they intend to contact. In addition, the applicant must sign a consent form permitting the eligible entity to contact specified third parties; this provides applicants the opportunity to withhold their consent for third party verification from one or more parties. An applicant must be given the opportunity to withhold consent related to each party the eligible entity would like to contact. If applicants do not sign the consent form, the eligible entity may not contact that party and the applicant remains responsible for providing appropriate documentation.

Supersedes: CSBG WV IM 2024-01	WVDED CSBG Policies and Procedures
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 WEST VIRGINIA Economic Development	<u>CSBG Policies & Procedures</u> Customer Eligibility & Documentation	Effective Date: 10/1/2024
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Eligibility Determination Records Which Must Be Retained in the Customer File:

An eligible entity must retain an eligibility determination record for each applicant for CSBG services/benefits in the state data management system, LITT TM, which includes:

- An electronic verification submitted reviewing all customer information by the staff person who made the eligibility determination certifying that the information on eligibility in the file is accurate to the best of the person's knowledge, and based on that information, the employee has determined the applicant to be eligible for services.
- An electronic record of all documents submitted by the applicant relating to the applicant's eligibility for services and any staff member's notes recording any other information related to eligibility received from any source;

Additional Records Which Must Be Retained in the Electronic Customer File:

The following information must be uploaded into the CSBG customer's electronic record in the state data management system (LITT).

- Proof of identity for all household members 18 years of age and older;
 - Valid Forms of ID may include: state or federal issued identification including drivers license, birth certificate, student ID card, social security card, military ID, Passport/Passport card, work/student visas, green cards.
 - If the CEE staff have any doubt in the validity of the applicant's identity, a second form of identification may be requested.
 - Verification of Identity Affidavit: In instances where an applicant does not have a valid proof of identity and needs emergency assistance, the applicant may complete the Verification of Identity Affidavit.
- Income verification documentation for all household members 18 years of age and older;
- Documentation of the customer's CSBG benefit, i.e. a copy of the rent/mortgage invoice/bill and CAA's payment to the vendor along with the canceled check, or a copy of the training certification received.
- If applicable, verification of any required co-payments. If the maximum benefit is not sufficient to continue service, documentation that the customer has made a co-payment must be obtained prior to processing the CSBG benefit. Include appropriate comments in the customer's file.
- A complete and verified electronic CSBG Intake record in LITT;
- If the application is denied, documentation and notes supporting the reason for ineligibility must be noted in the electronic client file, such as "Pending/Incomplete Documentation".

Supersedes: CSBG WV IM 2024-01	WVDED CSBG Policies and Procedures
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 WEST VIRGINIA Economic Development	<u>CSBG Policies & Procedures</u> Eligible Entity Designation & Redesignation	Effective Date: 10/1/2024
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SUBJECT: CSBG Eligible Entity Designation & Redesignation Procedures

PURPOSE:

In the event that a CSBG Eligible Entity's organizational eligibility for CSBG funding is terminated or reduction of funding occurs, the State will follow the procedures outlined below for the designation of a new eligible entity or the redesignation of eligible entities in any unserved counties.

PROCEDURES:

In the event that the State de-designates an eligible entity, or otherwise reduces funds, any resulting funding may be awarded only to organizations that are eligible entities for CSBG funds.

The State will, at its discretion, first solicit applications from existing CSBG eligible entities and make recommendations to the Governor of West Virginia to designate an existing CSBG eligible entity which is either.

- Geographically located in the un-served area that is capable of providing a broad range of services designed to eliminate poverty and foster self-sufficiency and meets the requirements of the CSBG Act; or
- Geographically located in an area contiguous to or within reasonable proximity of the un-served area and is already providing related services in the un-served area.

States must grant the designation to an organization of demonstrated effectiveness in meeting the goals of the CSBG Act, and may give priority to an eligible entity in a contiguous area that is already providing effective services that meet the purposes and goals of CSBG in the un-served area.

If the State determines that a new eligible entity would best serve a specific services area, the CSBG State Office will solicit applications in accordance with the procedures outlined below, and make recommendations to the Governor of West Virginia to designate a new CSBG eligible entity. The new entity must be a private nonprofit organization that is geographically located in the un-served area that is capable of providing a broad range of services designed to eliminate poverty and foster self-sufficiency and meets the requirements of the CSBG Act.

Any nonprofit receiving CSBG funds must meet the tripartite board requirements specified in Section 676B of the CSBG Act. In the event that a new private nonprofit organization is selected and designated by the Governor of West Virginia as the CSBG eligible entity, the organization will have 90 days to meet the definition of a CSBG eligible entity in accordance with the CSBG Act including establishing a tripartite board of directors.

The process of soliciting applications to select a new eligible entity may take place during the period in which the Department of Health and Human Services is reviewing a State decision to terminate an organization's eligibility for CSBG funds. However, the State may not award the funds to a new eligible

entity until the Department confirms the State’s finding for cause or the 90-day period for Federal review has passed.

Application Requirements for the Designation of New CSBG Eligible Entities:

Eligible applicants are private, nonprofit organizations that are geographically located in the un-served area that are capable of providing a broad range of services designed to eliminate poverty and foster self-sufficiency and meet the requirements of the CSBG Act

Applicants must have a valid West Virginia Business License and be registered as a vendor in good standing with the State of West Virginia. It is also required that the applicants have a System for Award Management (SAM) registration and have a Unique Entity Identifier (UEI).

Specific application requirements and instructions will be made available by the CSBG Lead Agency at the time of solicitation.

Application Requirements for the Redesignation of Existing CSBG Eligible Entities:

Eligible applicants are existing Community Action Agencies that are designated by the Governor of West Virginia to administer the Community Services Block Grant, and must be geographically located in the un-served area or in an area contiguous to or within reasonable proximity of the un-served area. Applicants must be capable of providing a broad range of services designed to eliminate poverty, foster self-sufficiency, and be in compliance with the requirements of the CSBG Act and all applicable federal, state, and local regulations. CSBG Eligible Entities must have a valid West Virginia Business License and be registered as a vendor in good standing with the West Virginia State Auditor’s Office. It is also required that the applicants have an active System for Award Management (SAM) registration and have a Unique Entity Identifier (UEI).

Specific application requirements and instructions will be made available by the CSBG Lead Agency at the time of solicitation.

Supersedes: N/A	WVDED CSBG Policies and Procedures
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 WEST VIRGINIA Economic Development	<u>CSBG Policies & Procedures</u> Monitoring, Corrective Action, and De-designation	Effective Date: 10/1/2024
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SUBJECT: CSBG Monitoring, Corrective Action, and De-designation

PURPOSE:

The State Office is committed to the diligent adherence to the requirements of Section 678B (a) of the Community Services Block Grant (CSBG) Act. Monitoring is one of the most important forms of support the State Office can provide to subrecipients. While the basic obligation of monitoring is to assess compliance, the State Office also views monitoring as a continuing opportunity to learn about the subrecipient, the communities it serves, and to offer technical assistance or provide support to the entity as requested. Based on routine State monitoring, reviews, or investigations related to specific complaints or allegations, the State CSBG office may determine that an eligible entity has failed to comply with the terms of an agreement or a State plan, or to meet a State requirement. In such cases, the State will follow the corrective action procedures outlined below. In instances where corrective action procedures are not sufficient, or deficiencies involve evidence of fraudulent reporting or use of funds, or other evidence of criminal wrongdoing, the State will follow the termination or reduction of funding procedures outlined below.

CSBG MONITORING PROCEDURES:

Types of State Monitoring

The State Office will conduct the following types of monitoring of CSBG subrecipients.

- A. **Biannual Comprehensive Monitoring:** In compliance with the CSBG Act, the State Office will conduct a comprehensive monitoring biannually. The purpose of the monitoring is to assess compliance of the eligible entity with the programmatic and fiscal requirements of the CSBG Act, as well as an assessment of the CSBG Organizational Standards. This monitoring will be conducted in accordance with the guidance provided in Information Memorandum Transmittal No. 97, dated October 10, 2006.
- B. **New Eligible Entity Monitoring:** An onsite review of each newly designated eligible entity is conducted immediately after the completion of the first year in which such entity receives funds through the Community Services Block Grant program.
- C. **Follow-up Monitoring:** Follow-up reviews will occur for subrecipients, and their programs that fail to meet the goals, standards, and requirements established by the State. If the on-site monitoring reveals serious deficiencies and/or deficiencies are not corrected in a timely manner in accordance with requirements, the State Office will conduct a follow-up on-site monitoring review and provide training and technical assistance as deemed necessary.
- D. **Additional Monitoring:** Other reviews are conducted as appropriate. These might include reviews of CSBG subrecipients with programs that have had other Federal, state,

or local grants (other than assistance provided under the Community Services Block Grant program) terminated for cause. ('676B(a) When a CSBG subrecipient is experiencing problems with programs other than CSBG, the State Office will conduct additional reviews and maintain close contact with the entity to ensure that state staff members are available to provide training and technical assistance as deemed necessary for the CSBG program operations.

- E. The State will thoroughly investigate any instances of "whistleblower" complaints or allegations of fraud or abuse of CSBG funds or funds from closely-related programs. In any instances in which complaints or allegations of fraud are considered credible and raise significant "red flags," OCS will be informed of findings and may assist with additional compliance review or referrals to appropriate investigative authorities.
- F. The State also conducts routine in-house desk reviews which include an examination of performance and expenditure rates based on monthly reports submitted to the State Office by each subrecipient and a review of periodic outcome and performance data.

Pre-Monitoring Procedures:

The State Office will provide timely notification of monitoring of subrecipients and complete some parts of the monitoring prior to arriving on-site for monitoring. Those activities include:

- A. Distribute notification of monitoring at least 30 days prior to on-site monitoring to the Executive Director, CFO, and CSBG designated point of contact. The subrecipient should confirm receipt of the notification and respond within 48 hours if the dates for monitoring need to be changed for any reason. Provision of a 30-day notice may not be possible for Follow-up monitoring or Additional monitoring.
- B. Once the dates of monitoring have been confirmed, the subrecipient will prepare and send the items requested in the official notification of monitoring by the deadline indicated in the notification.
- C. Once the documents are received, a monitoring team member will confirm receipt of the documents.
- D. During the week prior to on-site monitoring, the State Office monitoring team will request any additional information needed from the subrecipient and confirm arrival times and any necessary logistics.

On-site Monitoring Procedures:

The State Office will make all efforts to conduct an on-site monitoring as indicated in the Types of Monitoring listed above. A typical visit can be expected to require three (3) to five (5) days on-site. The State Office reserves the right to conduct comprehensive monitoring virtually if necessary. If monitoring must be conducted virtually due to extenuating circumstances, the monitoring may take longer. Monitoring types a, b, and d noted above will usually consist of the following:

- Entrance and Exit meetings.
- Review of subrecipient policies and procedures, governance documents, personnel documents, program documents, and other documentation as needed.
- Interviews with program staff regarding program operations and job functions.
- Interviews with administrative and fiscal staff.

- Interviews with members of the tripartite board of directors.

Post-Monitoring Procedures:

The State Office will provide timely feedback to subrecipients on the results of each monitoring visit with an opportunity for the monitored entity to respond to all observations, concerns, and findings.

Monitoring Reports will be provided within 60 calendar days of the conclusion of monitoring. A copy of the monitoring report may also be provided to the presiding officer and/or the entity's governing board at the discretion of the State Office. Monitoring Reports will make note of any previous findings in addition to current monitoring observations, concerns, and findings.

When the State has determined that a Subrecipient has any issues of non-compliance, the State will communicate the issues of non-compliance to the Subrecipient and require the Subrecipient to correct each issue of non-compliance. To establish compliance with the requirements of the CSBG Act, records of correspondence or other communications related to an enforcement action against an eligible entity will be maintained.

CORRECTIVE ACTION PROCEDURES:

Determination of Performance Deficiencies or Failure to Comply with State Requirements:

Based on routine State monitoring, reviews, or investigations related to specific complaints or allegations, the State may determine that an eligible entity has failed to comply with the terms of an agreement or a State plan, or to meet a State requirement. The State's determination may be based on the agency's failure to provide CSBG services, or to meet appropriate standards, goals, or other requirements established by the State, including performance objectives. The State will document the basis for such determination and the specific deficiency or deficiencies that must be corrected.

Communication of Deficiencies and Corrective Action Requirements:

When the State has determined that a Subrecipient has a specific deficiency, the State will communicate the deficiency to the Subrecipient and require the Subrecipient to correct the deficiency within the amount of time specified by the State.

Technical Assistance to Correct Deficiencies:

The State will offer training and technical assistance, if appropriate, to help a Subrecipient correct identified deficiencies or failures to meet State requirements. Technical assistance may be offered concurrently with the notification of a deficiency or deficiencies and should focus on the specific issues of the Subrecipient to the extent possible.

The State will prepare and submit to the Secretary, a report describing the training and technical assistance offered. Alternatively, if the State determines that training and technical assistance are not appropriate, the State must prepare and submit a report to the Secretary stating the reasons that technical assistance is not appropriate.

Some examples of situations in which the State may determine that technical assistance is not appropriate may include, but are not limited, to the following:

- A deficiency for which the Subrecipient has the expertise and skills available within the organization to make corrective actions without assistance;
- A deficiency for which the State has previously provided technical assistance and the Subrecipient has failed to institute corrective actions;
- Multiple, widespread, and/or repeated deficiencies that cannot feasibly be addressed through technical assistance;
- A deficiency that involves evidence of fraudulent reporting or use of funds, or other evidence of criminal wrongdoing.

Quality Improvement Plan

Section 678C(a)(4) of the CSBG Act allows for State discretion in the implementation of a quality improvement plan by a Subrecipient to correct an identified deficiency or deficiencies. The State will consider the seriousness of the deficiency and the time reasonably required to correct the deficiency.

Examples of instances in which the State may exercise discretion on whether a quality improvement plan is appropriate or necessary may include, but are not limited to the following:

- A deficiency for which a Subrecipient has previously instituted a corrective action plan and has repeated findings;
- A deficiency that involves evidence of fraudulent reporting or use of funds, or other evidence of criminal wrongdoing and therefore presents a risk requiring immediate action.

If the State determines that a Subrecipient should be allowed to develop and implement a QIP, the State will allow the Subrecipient up to 30 days to develop their plan after being informed of a deficiency. The State will review quality improvement plans and issue decisions on whether the plans are approved or need revisions within 30 days of receipt of the Subrecipient's plan to correct the deficiency. Including both 30 day allotments of time for development of a corrective action plan by the Subrecipient and time for the State to review and accept the plan, the Subrecipient will have 60 days to develop and implement their plan to correct deficiencies.

The quality improvement plan should identify actions that will be taken to correct the deficiency within a reasonable period of time as determined by the State. The State may exercise discretion based on the specific circumstances.

If a QIP is allowed, the State will review and issue a decision on whether to approve the plan no later than 30 days after receiving the plan from an eligible entity. If the State does not accept the plan, the State must specify the reasons why the proposed plan cannot be approved and allows time for a revised plan by the Subrecipient.

A follow-up on-site or desk monitoring will be scheduled as deemed necessary to ensure that deficiencies have been corrected. Once the State Office monitoring team has determined that all deficiencies have been corrected, the entity will be informed, and the Quality Improvement Plan will be closed.

In instances where technical assistance or a quality improvement plan are not appropriate, the State will proceed with Termination Procedures outlined in the next section.

CSBG DE-DESIGNATION:

Under Sections 676(c)(1)(B) and 676(c)(2) of the CSBG Act, States may reduce funding or terminate eligibility for CSBG funding based on an eligible entity's failure to comply with the terms of an agreement or a State plan, or to meet a State requirement, to provide services, or to meet appropriate standards, goals, and other requirements established by the State, including performance objectives.

If the State determines that a CSBG Eligible Entity's adherence to CSBG requirements cannot be improved through technical assistance and/or a quality improvement plan as noted above in Corrective Action Procedures; the State will notify the CSBG Eligible Entity's chief executive director and governing board president of the decision to initiate funding reduction or termination of organizational eligibility for CSBG funding, the reasons for the decision, and an opportunity for a hearing with at least thirty (30) days notice of the hearing.

Opportunity for a Hearing:

Under Section 678C(a)(5) of the CSBG Act, the State will provide adequate notice and opportunity for a hearing prior to terminating organizational eligibility for CSBG funding or otherwise reducing the proportional share of funding to an entity for cause.

From the date the subrecipient is notified of the decision to initiate funding reduction or termination, the subrecipient will have ten (10) days to confirm in writing if they wish to proceed with the scheduled hearing. Lack of response within ten (10) days waives the subrecipient's right to a hearing, and reduction or termination of organizational eligibility for CSBG funding will proceed without a hearing.

Hearing Procedures:

If the eligible entity confirms in writing that they wish to proceed with the scheduled hearing; a hearing shall be conducted at the time and location noted. The purpose of the hearing is to review the cause of the proposed termination, and provide an opportunity for the eligible entity to present evidence that the reasons for termination or reduction of funding are not warranted.

The WVDED General Counsel or Deputy General Counsel will preside as the hearing official. The review panel shall also consist of the WVDED Director or Deputy Director and a representative from the Accounting/Finance department.

The panel members shall convene the hearing and issue its recommendation(s) to the CSBG Authorized Official within seven (7) days following the hearing.

The CSBG Authorized Official shall notify the eligible entity of the Department's final decision on the case within fourteen (14) days after the hearing.

A transcript shall be provided by a court reporter to the CSBG Lead Agency as an official record of the hearing.

The State will maintain all necessary documentation relating to the determination, including, for example, transcripts of the hearing and any documentation used in reaching the State's decision. For purposes of any Federal review, the state will maintain the following information:

- A copy of the notice providing an opportunity for a hearing that includes the date of the notice and the date of the proposed hearing;
- The name of the presiding hearing official;
- The name(s) of official(s) or individual(s) responsible for determination of hearing findings or decisions;
- The names of the individuals participating in the hearing; and
- Documentation of evidence presented at the hearing.

State Proceedings to Terminate or Reduce Funding:

After providing an opportunity for a hearing, if the State finds cause for termination or reduction in funding, the State may initiate proceedings to terminate the designation of or reduce the proportional share of funding to an eligible entity. If a State CSBG Lead Agency determines that funding will be reduced or that eligibility for CSBG funds will be terminated, the State must notify both the eligible entity and OCS of the decision.

Opportunity for Federal Review:

A Federal review of the State decision to reduce or terminate funding may be initiated through a request from the affected organization. In accordance with 45 CFR §96.92, an eligible entity has 30 days following notification by the State of its final decision to request a review by the Secretary of the Department of Health and Human Services (HHS).

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

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

Address to Request Federal Review:

To ensure that requests are received in time for Federal review, it is strongly recommended that requests be sent via overnight mail with a signed certification of receipt. Requests for review must be sent to the attention of the Division of State Assistance in the Office of Community Services at the following address:

U.S. Department of Health and Human Services
Administration for Children and Families
Office of Community Services
Division of State Assistance
Attention: Community Services Block Grant Program


370 L'Enfant Promenade S.W., 5th Floor West
Washington, D.C. 20447

Overnight mail submissions may be sent directly to the assigned Office of Community Services' CSBG Program Services - Regional Contacts to provide notification that a request has been submitted. This contact information is available on the CSBG program website.

Expedited Federal Review and Technical Assistance:

While the CSBG Act specifies that a Federal review of State documentation for terminating the designation or reducing funding to an eligible entity must be completed within 90 days, an expedited Federal review may be possible in some instances. This is particularly true in circumstances in which the State has consulted closely with OCS before and during proceedings and has provided documentation at each step of the process as described above. In some instances, particularly those involving potential waste, fraud and abuse, an on-site Federal review may be arranged to expedite the review of documentation and assist with CSBG procedures and requirements.

The WV DED electronic version is the control version. All other printed or electronic versions are uncontrolled.

 WEST VIRGINIA Economic Development	<u>CSBG Policies & Procedures</u> Use of Funds for Construction and Waiver Request Procedures	Effective Date: 1/1/2025
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SUBJECT: Use of Funds for Construction and Waiver Request Procedures

PURPOSE:

The purpose of this policy is to describe the limitations of CSBG funding for the purchase, construction, or permanent improvement of any building or other facility, and the procedures for requesting a waiver to those limitations in extraordinary circumstances.

Section 678F of the CSBG Act states the following:

(a) CONSTRUCTION OF FACILITIES.--

(1) LIMITATIONS.-- Except as provided in paragraph (2), grants made under this subtitle (other than amounts reserved under section 674(b)(3)) may not be used by the State, or by any other person with which the State makes arrangements to carry out the purposes of this subtitle, for the purchase or improvement of land, or the purchase, construction, or permanent improvement (other than low-cost residential weatherization or other energy-related home repairs) of any building or other facility.

(2) WAIVER.--The Secretary may waive the limitation contained in paragraph (1) upon a State request for such a waiver, if the Secretary finds that the request describes extraordinary circumstances to justify the purchase of land or the construction of facilities (or the making of permanent improvements) and that permitting the waiver will contribute to the ability of the State to carry out the purposes of this subtitle.

The following defines the types of purchases associated with this limitation and establishes standardized procedures for requesting and approving waivers.

DEFINITIONS:

Construction includes the following:

1. New buildings and structures.
2. Additions, alterations, conversions, expansions, reconstruction, renovations, rehabilitations, and major replacements (such as the complete replacement of a roof or heating system).
3. Mechanical and electrical installations such as plumbing, heating, electrical work, elevators, escalators, central air-conditioning, and other similar building services.
4. Site preparation and outside construction of fixed structures or facilities such as sidewalks, highways and streets, parking lots, utility connections, outdoor lighting, railroad tracks, airfields, piers, wharves and docks, telephone lines, radio and television towers, water supply lines,

sewers, water and signal towers, electric light and power distribution and transmission lines, petroleum and gas pipelines, and similar facilities that are built into or fixed to the land.

5. Installation of the following types of equipment: boilers, overhead hoists and cranes, and blast furnaces.
6. Fixed, largely site-fabricated equipment not housed in a building, primarily for petroleum refineries and chemical plants, but also including storage tanks, refrigeration systems, etc.
7. Cost and installation of construction materials placed inside a building and used to support production machinery; for example, concrete platforms, overhead steel girders, and pipes to carry paint, etc. from storage tanks.

The following are excluded from construction:

1. Maintenance and repairs to existing structures or service facilities.
2. Cost and installation of office furniture and equipment items not specifically covered above, which are needed for the administration of the program.

Permanent Improvements: Permanent improvements are defined in 2 CFR 200 as Capital Expenditures:

Capital Expenditures: Expenditures to acquire capital assets or expenditures to make additions, improvements, modifications, replacements, rearrangements, reinstallations, renovations, or alterations to *capital assets* that materially increase their value or useful life.

Capital Assets:

1. Tangible or intangible assets used in operations having a useful life of more than one year which are capitalized in accordance with GAAP. Capital assets include:
 - (i) Land, buildings (facilities), equipment, and intellectual property (including software), whether acquired by purchase, construction, manufacture, exchange, or through a lease accounted for as financed purchase under Government Accounting Standards Board (GASB) standards or a finance lease under Financial Accounting Standards Board (FASB) standards; and
 - (ii) Additions, improvements, modifications, replacements, rearrangements, reinstallations, renovations, or alterations to capital assets that materially increase their value or useful life (not ordinary repairs and maintenance).
2. For purpose of this part, capital assets do not include intangible right-to-use assets (per GASB) and right-to-use operating lease assets (per FASB). For example, assets capitalized that recognize a lessee's right to control the use of property or equipment for a period of time under a lease contract.

Secretary: The term 'Secretary' means the Secretary of the U.S. Department of Health and Human Services.

PROCEDURES:

While CSBG funds may not be used for the repair or permanent improvements to property, Section 678F(a)(2) of the CSBG Act allows the Secretary of the Department of Health and Human Services (HHS) to waive restrictions on the use of CSBG funds for purchase or improvement of land, or the purchase, construction, or permanent improvement of property in extraordinary circumstances if doing so will contribute to the ability of the state to carry out the purposes of the grant.

Based on CSBG IM #154, OCS will consider and expedite responses to waiver requests for emergency repairs for service facilities directly impacted by a disaster that are not covered by other federal disaster assistance or other sources such as property insurance. The responsible state CSBG official must submit a waiver request signed by the state CSBG Authorizing Official and addressed to the Secretary of HHS with attention to the Director of OCS describing the extraordinary circumstances that justify the waiver. The request must explain how the waiver will contribute to the state's ability to meet and carry out the purposes of the CSBG program in the disaster circumstances.

Prior to submission of a waiver request, state CSBG lead agencies should assist CSBG eligible entities in accessing all other available sources of support for these needs. For repair, renovation and/or rebuilding requests, states must also establish procedures for verifying that costs associated with these activities are not reimbursable through the Federal Emergency Management Agency (FEMA) disaster assistance, under a contract for insurance, or covered by self-insurance. Use of CSBG funds for repair, rebuilding, and/or reconstruction of facilities creates a reversionary federal interest in the property, and requirements for a notice of federal interest will be included in a waiver approval.

In the event an Eligible Entity believes there is just cause to submit a request to the Secretary for a waiver due to extraordinary circumstances such as a natural disaster, the following information must be submitted to the State for review. The State will consider the information and determine whether or not it merits a request to the Secretary for a waiver.

Procedures for requesting and approving waivers

A waiver request must be sent to the State on company letterhead including the following information:

- The official name and UEI of the organization.
- The specific expenditures for which the waiver is being requested.
- A detailed description of the purchase, the anticipated cost, and grant number.
- A description of the extraordinary circumstances which justify the need for a waiver request.

The State will review the request within 10 business days and will make a determination on whether or not there is justification for the waiver request. If the State agrees with the request, it will be sent to the State's point of contact at the Office of Community Services and request further instructions. If the State does not feel that the circumstances warrant a request for a waiver, a response will be sent to the agency outlining the reasons for the decision.

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