

**Title18: Human Services**

**Part 15: Division of Community Services**

**Part 15 Chapter 1: Community Service Block Grant (CSBG)**

*Rule 15.1 Community Service Block Grant (CSBG) State Plan*

Source: Miss Code Annotated 43-1-2.

**COMMUNITY SERVICES BLOCK GRANT (CSBG)**

**MODEL PLAN**

**FISCAL YEAR (FY) 2015**

**GRANTEE: STATE OF MISSISSIPPI**

**EIN: 64-6000807**

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DIVISION OF COMMUNITY SERVICES  
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Administration for Children and Families  
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Washington, DC 20447**

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## INTRODUCTION

This State Plan serves as the State of Mississippi's application for Federal CSBG funding. The Plan describes Mississippi's proposed use of FFY 2015 CSBG funding to produce positive outcomes targeted toward the elimination of the causes and effects of poverty.

Following the lead of NASCSP, the Mississippi Department of Human Services-Division of Community Services (MDHS-DCS) is committed to a process that fosters the following:

**“Mutual Respect”**- In working with grantee boards, staff and consultants, CSBG offices value and recognize the unique knowledge, ability and independence of each person. CSBG offices are committed to treating all persons fairly and maintaining credibility by matching actions with words.

**“Open Communication”**- Effective communication is the key to facilitating good working relationships with partners, and CSBG offices are committed to keeping lines of communication open. The purpose of communication is to assist in developing solutions to problems, to share program improvement, ideas, and provide information on new developments in the anti-poverty fields. CSBG offices communicate frequently through a variety of tools and media. CSBG offices are open to contact and are committed to listening to suggestions/concerns and to gain an understanding of local operations and to assist locals in pursuing priorities.

**“Joint Problem Solving”**- CSBG offices operate under the basic belief that a team approach to problem solving is in the best interest of all parties involved. CSBG offices sincerely believe that collectively the office and the entity can arrive at the best solution to any situation. Through a team approach to problem solving, CSBG offices think outside the traditional ways to come up with the best strategies for program development, conflict resolution, or compliance issues. CSBG offices want to promote an environment in which the office and all Community Action partners will be open to change and can work together in exploring options and developing mutually agreeable solutions. The goal is to have entities function independently with CSBG office support in an effort to meet the needs of local communities within the parameters set by legislation. (NASCSP, 2006)

### **The Community Services Block Grant and Community Action Agencies**

In 1964, President Lyndon Johnson signed the Economic Opportunity Act and declared War on Poverty in America. Federal funding from the Economic Opportunity Act facilitated the creation of hundreds of locally designed and governed organizations to address poverty issues at the community level. These entities were called “community action entities”.

In 1981, with the creation of a state block grant program, the Community Services Block Grant (CSBG) replaced the system of direct Federal funding to local community action entities. Originally created as a part of the Omnibus Budget Reconciliation Services Act of 1981, CSBG has undergone a number of important Congressional reauthorizations. The primary focus of the

program, however, has remained solid - to address the causes and effects of poverty through locally designed strategies.

### **Characteristics Common to Mississippi's Community Action Agencies**

The state has eighteen (18) eligible entities encompassing Community Action Agencies/Human Resource Agencies (CAAs/HRAs) that provide an array of services designated to ameliorate the causes and effects of poverty in the low-income communities. In 2005, the state mandated that eligible entities utilize a revised case management plan approach as the blueprint for service delivery.

The CAAs administer seven (7) Head Start Programs in the State. Thus, we have also engaged memorandums of understanding to coordinate services with Head Start personnel in the State to assure that low-income clients were afforded all opportunities to become successful. As research points out, over 90% of all Head Start families are eligible for CSBG services. The combined efforts of CSBG/LIHEAP and Head Start personnel will allow, encourage and support shared informational files, service delivery plans, outreach activities and support systems in assisting low-income Mississippians to becoming self-sufficient. MDHS-DCS will further enhance previous partnerships formed with WIN Job Centers, legal services, community health centers, area colleges and universities to continue the educational development of the staff to meet the ever changing needs and demands of the low income community. CAAs must also provide additional training for support staff in accounting and computer usage to assure accountability in the disbursement of funds and collection of data to support outcome measures established by the entity.

## **FFY 2015 MISSISSIPPI CSBG STATE PLAN**

### **I. Federal and Fiscal Year Covered by this State Plan and Application**

This document is the Mississippi CSBG State Plan and Application for FFY 2015, beginning January 1, 2015 and concluding December 31, 2015.

### **II. Letter of Transmittal**

A letter of transmittal addressed to the Office of Community Services has been included as part of Appendix A. The letter includes contact information for MDHS-DCS staff that is responsible for the administration of CSBG within the State of Mississippi.

### **III. Executive Summary**

#### **A. CSBG State Legislation**

Mississippi does not have State statutes specific to CSBG.

## **B. Designation of a Lead State Entity to Administer the CSBG Program**

The designated lead entity for CSBG in the State of Mississippi is the Mississippi Department of Human Services-Division of Community Services.

The letter of designation has been included within this State Plan (see Appendix A).

## **C. Legislative Public Hearing Requirements**

### **1. Public Hearing**

A public hearing was held on the FFY 2015 CSBG State Plan on June 10, 2014. Notice of the public hearing appeared in the Clarion Ledger, with statewide distribution, and nine other newspapers on June 6, 2014. Copies of the documentation pertaining to the legislative public hearing are included in this application as Appendix H.

### **2. Legislative Public Hearing**

A legislative public hearing was held on the FFY 2015 CSBG State Plan on June 10, 2014. Notice of the public hearing appeared in the Clarion Ledger, with statewide distribution, and nine other newspapers on June 6, 2014. Copies of the documentation pertaining to the legislative public hearing are included in this application as Appendix H.

### **3. Public Inspection of the Plan**

An administrative procedures notice is filed with the Secretary of State twenty (20) calendar days before the Public Hearing. At any time within the twenty (20) day public comment period, written submissions including arguments, data, and views on the proposed rule/amendment/repeal may be submitted to the agency. The proposed plan is also uploaded to the State database for comments and feedback from eligible entities thirty (30) days before the Public Hearing.

The availability of the FFY 2015 CSBG State Plan for inspection was made known in the Public Hearing announcement described above. The State Plan was made available for public inspection by calling the MDHS-DCS, as stated in the legislative public hearing notice. Opportunities for comment were also available during the public hearing held at 10:00 am on June 10, 2014 at the Mississippi State Capitol, 400 High Street, Room 113, Jackson, Mississippi.

#### **IV. Statement of Federal and CSBG Assurances (which include programmatic, administrative, financial and certifications)**

As part of the application and plan required by Section 676 of the Community Services Block Grant Act (The Act), as amended (42 U.S.C. 9901 et seq.), the designee of the chief executive of the State of Mississippi hereby agrees to the Assurances in Section 676 of the Act.

##### **A. Programmatic Assurances**

1. Funds made available through this 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 part A of title IV of the Social Security Act (42 USC 601 et seq.), homeless families and individuals, migrant or seasonal farm workers, and elderly low-income individuals and families to enable the families and individuals:
    - i. To remove obstacles and solve problems that block the achievement of self-sufficiency (including self-sufficiency 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 low-income families in the communities involved, which may include carrying out 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 family and individual needs; and
    - 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 entities, local housing authorities, private foundations, and other public and private partners to document best practices based on successful grassroots intervention in urban areas, to develop methodologies for widespread replication; and strengthen and improve relationships with local law enforcement entities, which may include participation in activities such as neighborhood or community policing efforts;

- b) To address the needs of youth in low-income communities through youth development programs that supports 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: programs for the establishment of violence-free zones that would involve your development and intervention models (such as models involving youth mediation, youth mentoring, life skill training, job creation, and entrepreneurship programs); and after-school child care programs;
  - c) To make more effective use of, and to coordinate with, other programs (including State welfare reform efforts). [676(b) (1)]
- 2. To describe how the State intends to use discretionary funds made available from the remainder of the grant or allotment described in section 675C (b) of the Act in accordance with the community services block grant program, including a description of how the State will support innovative community and neighborhood-based initiatives related to the purposes of the community services block grant program. [676(b) (2)]
- 3. To provide information provided by eligible entities in the State, including:
  - a) a description of the service delivery system, for services provided or coordinated with funds made available through grants made under section 675C(a) of the Act, targeted to low-income individuals and families in communities within the State;
  - b) a description of how linkages will be developed to fill identified gaps in services, through the provision of information, referrals, case management, and follow-up consultations;
  - c) a description of how funds made available through grants made under section 675(a) will be coordinated with other public and private resources; and,
  - d) a description of how local entities will use the funds to support innovative community and neighborhood-based initiatives related to the purposes of the community services block grant, which may include fatherhood initiatives and other initiatives with the goal of strengthening families and encouraging effective parenting. [676(b) (3)]
- 4. To ensure 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. [676(b) (4)]

5. That the State and the 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 to low-income individuals and to avoid duplication of such services, and a description of how the State and the eligible entities will coordinate the provision of employment and training activities in the State and in communities with entities providing activities through statewide and local workforce investment systems under the Workforce Investment Act of 1998. [676(b) (5)]
6. That the State will ensure coordination between anti-poverty 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 communities. [676(b) (6)]
7. To permit and cooperate with Federal investigations undertaken in accordance with section 678D of the Act. [676(b) (7)]
8. To ensure that any eligible entity in the State that received funding in the previous fiscal year through a community services block grant under the community services block grant program 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) of the Act. [676(b) (8)]
9. 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. [676(b) (9)]
10. To 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. [676(b) (10)]
11. To secure from each eligible entity in the State, as a condition to receipt of funding, 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. [676(b) (11)]
12. That the State and all eligible entities in the State will, not later than fiscal year 2001, participate in the Results Oriented Management and Accountability System,

another performance measure system for which the Secretary facilitated development pursuant to Section 678E(b), or an alternative system for measuring performance and results that meets the requirements of that section, and a description of outcome measures to be used to measure eligible entity performance in promoting self-sufficiency, family stability, and community revitalization. [676(b) (12)]

13. To provide information describing how the State will carry out these assurances. [676(b) (13)]

## **B. Administrative and Financial Assurances**

The State of Mississippi agrees to the following, as required under the Act:

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(b)] –
2. To use not less than ninety (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, subject to the provisions regarding recapture and redistribution of unobligated funds outlined below. [’675C(a)(1) and (2)]
3. In the event that the State elects to recapture and redistribute funds to an eligible entity through a grant made under Section 675C(a)(1) when unobligated funds exceed twenty (20) percent of the amount so distributed to such eligible entity for such fiscal year, the State agrees to redistribute recaptured funds to an eligible entity, or require the original recipient of the funds to redistribute the funds to a private, nonprofit organization, located within the community served by the original recipient of the funds, for activities consistent with the purposes of the Community Services Block Grant program. [’675C (a)(3)]
4. To spend no more than the greater of \$55,000 or five (5) percent of its grant received under Section 675A or the State allotment received under section 675B for administrative expenses, including monitoring activities. [’675C(b)(2)]
5. In states with a charity tax credit in effect under state law, the State agrees to comply with the requirements and limitations specified in Section 675© regarding use of funds for statewide activities to provide charity tax credits to qualified charities whose predominant activity is the provision of direct services within the United States to individuals and families whose annual incomes generally do not exceed 185 percent of the poverty line in order to prevent or alleviate poverty among such individuals and families. [’675(c)]

6. That the lead agency will hold at least one hearing with sufficient time and statewide distribution of notice to provide to the public an opportunity to comment on the proposed use and distribution of funds to be provided through the grant under Section 675A or 675B for the period covered by the State plan. [676(a)(2)(B)]
7. The chief executive officer of the State will designate, and appropriate State Agency for purposes of carrying out State community services block grant program activities. [676(a)(1)]
8. That the lead agency will 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)]
9. To make available for the public inspection each plan in such a manner as will facilitate review of and comment on the plan. [676(e)(2)]
10. To conduct the following reviews of eligible entities:
  - a) Full onsite review of eligible entity at least once during three-year period;
  - b) An onsite review of newly designated entity immediately after the completion of the first year in which entity receives funds through the community services block grant;
  - c) Follow-up reviews including prompt return visits to eligible entities, and their programs, that fail to meet the goals, standards, and requirements established by the State;
  - d) Other reviews as appropriate, including reviews of entities with programs that have had other Federal, State, or local grants (other than assistance provided under the community service block grant program) terminated for cause. [678B(a)]
11. In the event the State determines that an eligible entity fails to comply with the terms of an agreement or the State plan, to provide services under the community services block grant program or to meet appropriate standards, goals, and other requirements established by the State (including performance objectives), the State will comply with the requirements outlined in Section 678C of the Act, to:
  - a) Inform the entity of the deficiency to be corrected;
  - b) Require the entity to correct the deficiency;

- c) Offer training and technical assistance as appropriate to help correct the deficiency, and submit the Secretary a report describing the training and technical assistance offered or stating the reasons for determining that training and technical assistance are not appropriate;
  - d) Offer the eligible entity an opportunity to develop and implement, within 60 days after being informed of the deficiency, a quality improvement plan and to either approve the proposed plan or specify reasons why the proposed plan cannot be approved;
  - e) After providing adequate notice and an opportunity for a hearing, initiate proceedings to terminate the designation of or reduce the funding to the eligible entity unless the entity corrects the deficiency. [678(C)(a)]
12. To establish fiscal controls, procedures, audits and inspections, as required under Section 678D (a) (1) and 678D (2) of the Act.
  13. To repay to the US amounts found not to have been expended in accordance with the Act, or the Secretary may offset such amounts against any other amount to which the State is or may become entitled under the community service block grant program. [678D (a) (3)]
  14. To participate, by October 1, 2001, and ensure that all eligible entities in the State participate in the Results-Oriented Management and Accountability (ROMA) System [678(a) (1)]
  15. To prepare and submit an annual report on the measured performance of the State and its eligible entities, as described under 678E (a) (2) of the Act.
  16. To comply with the prohibition against use of community services block grant funds 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, as described in Section 678F(a) of the Act.
  17. To ensure that programs assisted by community services block grant funds shall not be carried out in a manner involving the use of program funds, the provision of services, or the employment or assignment of personnel in a manner supporting or resulting in the identification of such programs with any partisan or nonpartisan political activity or any policy activity associated with a candidate, or contending faction or group, in an election for public or party office; any activity to provide voters or prospective voters with transportation to the polls or similar assistance with any such election, or any voter registration activity. [678F (b)]

18. To ensure that no person shall, on the basis of race, color, national origin or sex be excluded from participation in, be denied the benefits of, or be subjected to discrimination under, any program or activity funded in whole or in part with community services block grant program funds. Any prohibition against discrimination on the basis of age under the Age Discrimination Act of 1975 (42 U.S.C. 6101 et seq.) or with respect to an otherwise qualified individual with a disability as provided in Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 12131 et. Seq.) shall also apply to any such program or activity. [678F(c)]
19. To consider religious organizations on the same basis as other non-governmental organizations to provide assistance under the program so long as the program is implemented in a manner consistent with the Establishment Clause of the first amendment to the Constitution; not to discriminate against an organization that provides assistance under, or applies to provide assistance under the community services block grant program on the basis that the organization has a religious character; and not to require a religious organization to alter its form of internal government except as provided under Section 678B or to remove religious art, icons, scripture or other symbols in order to provide assistance under the community services block grant program. [679]

**C. Other Administrative Certifications**

The State also certified the following:

1. Provide assurances that cost and accounting standards of the Office of Management and Budget (OMB Circular A-110 and A-122) shall apply to eligible entities who are recipients of the community services block grant program funds.
2. To comply with the requirements of Public Law 103-227, Part C Environmental Tobacco Smoke, also known as the Pro-Children Act of 1994, which requires that smoking not be permitted in any portion of any indoor facility owned or leased or contracted for by an entity and used routinely or regularly for the provision of health, day care, education, or library services to children under the age of 18 if the services are funded by a Federal grant, contract, loan or loan guarantee. The State further agrees that it will require the language of this certification be included in any subawards, which contain provisions for children’s services and that all subgrantees shall certify accordingly.

“Signature (indicates the sign off of assurances in previous Section IV)”

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Richard A. Berry, Executive Director  
Mississippi Department of Human Services

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Date

## **V. CSBG State Plan Narrative**

### **A. Administrative Structure**

#### **1. State Administrative Entity, Mission and Objectives**

The Mississippi CSBG is administered by the Mississippi Department of Human Services-Division of Community Services. MDHS is a primary link between families and individuals with specific needs vital to their survival and the services available to meet those needs.

The mission of MDHS is to deliver, within established guidelines, a broad range of services to a diverse population in a professional, timely, accurate and compassionate manner. MDHS will further its mission by assisting those in need to overcome adversity, dependency, lack of self-esteem, gain self-confidence and self-sufficiency. It supports the community action vision and values through:

- a) Professional, accountable and responsible administration of CSBG
- b) Development of effective partnerships with CSBG entities, MDHS-DCS, and other State and Federal programs targeting low-income individuals.

Goals and Objectives:

The state will carry out the following goals, objectives and assurances as stated in Section 672 of the CSBG Act as amended, as follows:

- a) Emphasize the need for legal, effective and quality board of directors ensuring more diversity in service delivery, Community Involvement and Partnerships.
- b) Require entities to develop a comprehensive employment plan informing clients about the availability of jobs, training opportunities, resume development and employer outreach plan.
- c) Require entities to secure formal partnerships with primary health care entities, WIN Job Centers, community health centers and legal services to accept referrals from CAAs and assist eligible clients with desired services where possible.
- d) Require entities to develop and implement an entity outreach plan targeted to meet the challenges of elderly, disabled citizens, children with special needs and emergency disaster services.
- e) Require entities to develop and implement a non-monetary client assistance plans that will prepare clients for self-reliance or stability where funds or other

financial resources are not available or the client is not in compliance with the service plan.

- f) Encourage eligible entities to sponsor summer projects/activities for low-income youth to promote youth employment and enrichment.
- g) Require eligible entity to maintain Virtual ROMA compliance.
- h) Require improvement plans for challenged entities, to provide for a greater opportunity to be successful. Mandate that entities provide a performance improvement plan for success.
- i) Require entities to provide a comprehensive plan for Earned Income Tax Credit (EITC) Program and describe how it will be incorporated into case management for clients.
- j) Require that entities develop an informational package for clients. This package should be inclusive to the following: child support literature, child abuse/neglect literature, disaster relief plan, fair hearing procedures form(s) and information on all services provided by the entity.
- k) Require that entities provide a plan for client orientation in every service area to include when a brief or an abbreviated orientation is acceptable.
- l) Require that entities refer all non-elderly, non-disabled clients to the WIN Job Center.
- m) Require that entities provide a Crisis Plans for client services that relates to emergency and life threatening situations. This plan must include an 18 to 48 hour emergency and/or life threatening situation.
- n) Require that entities provide a Comprehensive Plan for follow-up to state entity on client complaints within the 24 hour timeframe.
- o) Require that entities meet the Organizational Standards.
- p) Require that entities participate in the ACH process for paying all energy vendors.
- q) Require entities to submit subgrant proposals, financial and programmatic reports through Mississippi's Accountability System for Government Information and Collaboration (MAGIC).

2. Eligible Entities

- a) Eighteen (18) designated CSBG-eligible entities presently exist in Mississippi. A list of the eligible entities is found in Appendix C.

3. Distribution and Allocation of Funds

In accordance with the CSBG Act:

- a) Ninety (90) percent of the State of Mississippi's total CSBG allocation will be distributed to the State's eligible entities.
- b) Five (5) percent of the State of Mississippi's total CSBG allocation will be distributed for discretionary projects related to the stated purposes and intended outcomes of the CSBG Act.
- c) Up to five (5) percent of the State of Mississippi's total CSBG allocation may be used for administration of CSBG. It will be the intent of MDHS-DCS to apply unspent CSBG administrative resources to discretionary projects related to the stated purposes and intended outcomes of the CSBG Act.

**B. Criteria and Formula for the Distribution of CSBG Funds**

The State will contract with eligible entities during Program Year 2015, beginning January 1, 2015 through December 31, 2015. Funds are obligated effective January 1 in accordance with MDHS Sugerantee Manual.

Allocable FFY 2015 Mississippi CSBG funds will be distributed on a formula basis, based on the percentage (latest Census data) of the poor population in a county compared to the statewide percentage (pending Federal allocation to the State of Mississippi). The CSBG subgrant allocations will use the following factors:

- 1. Twenty-five (25) percent of each eligible entities allocation **must** be allocated to the Supportive Services activity for direct client services.
- 2. Fifteen (15) percent of each eligible entities allocation may be used for the Administrative activity.
- 3. Sixty (60) percent of each eligible entities allocation may be used for the Case Management activity.

**TENTATIVE FFY 2015 ALLOCATIONS**

(These levels are dependent on the Federal CSBG award at the FFY 2014 level.  
Adjustments will be made once the final FFY 2015 awards are known.)

<b>Eligible Entity</b>	<b>Est. Allocation</b>
AJFC CAA	\$ 497,842
Bolivar Co CAA	\$203,663
Central Mississippi	\$620,945
Coahoma Opportunities	\$144,827
Gulf Coast CAA	\$583,833
Hinds County HRA	\$807,410
Jackson Co CAC	\$289,654
Lift	\$783,875
Mid-State Opportunities	\$575,687
Multi County CSA	\$764,867
Northeast MS	\$349,395
PRVO	\$1,065,383
Prairie Opportunity	\$710,557
South Central CAA	\$476,118
Southwest MS	\$305,042
Sunflower-Humphreys Co	\$195,516
United CAA	\$107,715
WWISCAA	\$570,256
<b>Total</b>	<b>\$9,051,678</b>

The 2010 Census prompted a review of the distribution formula and necessitated modification of each entities proportionate share.

Use of CSBG funds will be specifically limited to the stated purposes and requirements of the CSBG Act as allowed by applicable Federal and State regulations.

**Recapture and Redistribution Options** - During the current CSBG Program Year, while administering the ninety (90) percent of funds passed through the State of Mississippi to eligible entities, MDHS-DCS will not exercise the recapture and redistribution options granted under subsection 675C(a)(3) of the CSBG Act. CSBG funds are awarded to eligible entities on a 12-month basis; however, recipients are given 18 months to expend the funds.

### **C. Distribution and Use of Restricted Funds**

Ninety (90) percent of CSBG funds received by the State of Mississippi will be subgranted to benefit the State's designated CSBG-eligible entities.

In recent years, Mississippi has made a significant transition into an outcomes-oriented system of service delivery. As a result, eligible entities are required to focus their CSBG-supported activities on the six nationally identified CSBG goals.

1. Low-income people become more self-sufficient.
2. The conditions in which low-income people live are improved.
3. Low-income people own a stake in their community.
4. Partnerships among supporters and providers of services to low-income people are achieved.
5. Entities increase their capacity to achieve results.
6. Low-income people, especially vulnerable populations, achieve their potential by strengthening family and other supportive systems.

It is the nature and intentional design of CSBG to enable the creation of locally designed and administered solutions to poverty. Therefore, the specific methods and strategies by which eligible entities pursue the six national goals will vary from entity to entity. All eligible entities, however, will be required to use CSBG funding for the stated purposes within the CSBG Act. Mississippi community action entities have traditionally provided, and will continue to provide, services directly to low-income consumers and they will continue to serve as catalysts to community organization and coordination necessary for the development of additional services. While local-level strategies vary, based on

identified needs and available resources, service delivery will focus on the broad categories identified in the CSBG Act.

1. Self-Sufficiency
2. Better Use of Income
3. Community Coordination
4. Youth Development Programs
5. Community Participation

Projects and programs supported by CSBG resources will produce measurable outcomes in at least one of the six national goals and will be targeted to at least one of the identified service categories.

#### **D. Description of Distribution and Use of Discretionary Funds - 676(b) (2)**

MDHS-DCS will allocate at least 5 percent of CSBG funds received by the State for FFY 2015 to support discretionary projects related to the purposes of the CSBG Act and the six national goals.

A percentage of discretionary funds are allocated based on the following activities:

1. Capacity building- 57%: to include T&TA, IT needs for the Virtual ROMA system, staff training and ACH;
2. Corrective Action- 8%: to include partnerships with the state CAA association to assist CAAs with corrective action strategies and;
3. Other CSBG purposes- 35%: to include new and existing community projects for seniors and youth.

In FFY 2015, a portion of CSBG discretionary resources may be set aside to provide:

1. additional training and technical assistance responsive to the needs of the Mississippi network,
2. for activities supportive of community action entities' on-going development and implementation of Virtual ROMA;
3. for quality improvement initiatives,

4. for emergency needs (entity-in-crisis, natural disaster, etc.) and for other state-wide initiatives possibility including a plan to more directly reach counties located within the consortium territory.

The MDHS-DCS priorities for FFY 2015 CSBG discretionary funding will include:

1. Projects that support a sustainable system of continuous quality improvement in community action entity management and performance, including service delivery that moves individuals and families to greater levels of economic self-reliance.
2. One-time enhancement of existing, successful projects or programs directly related to one of the six national goals,
3. Statewide projects which have objectives consistent with the CSBG Act and
4. The development of new, community-based partnerships directly related to one of the six national goals.

#### **E. Description of Use of Administrative Funds**

MDHS-DCS will apply no more than 5 percent of its annual allocation toward State administrative expenses, with a firm belief that state CSBG staff must have ongoing opportunities to grow the requisite skills required to provide Mississippi community action entities with oversight, training and technical assistance and leadership. Professional development will be supported with administrative funds. State CSBG staff will be afforded opportunities, as schedules and MDHS-DCS administration will allow, to participate in the National Association for State Community Services Programs (NASCSPP) training conferences and events, the Community Action Partnership's annual training conference, and National ROMA Peer-to-Peer Trainer in-service events.

State staff, through on-going professional development, will maintain up-to-date knowledge of CSBG requirements and best practice and will be positioned to add value to the process; training and technical assistance will support the continued movement of the State's network beyond compliance and toward excellence.

CSBG administrative funds also assist the State of Mississippi in leveraging additional opportunities for low-income Mississippians through legal services and community health centers, and WIN Job Centers.

In previous years, MDHS-DCS has used unspent CSBG administrative resources to increase the amount of funding available for CSBG discretionary projects.

## **F. State Community Services Program Implementation - 676(b) (3)**

### **1. Program Overview**

#### **a) The Service Delivery System**

The service delivery system used to deliver CSBG services is provided by eligible entities to meet identified community and the needs of eligible families and to produce outcomes based upon the six national goals. Service delivery systems, therefore, vary from entity to entity, just as the communities and people served vary.

Commonalities to the service delivery system include:

- i. Community outreach to ensure awareness of opportunities for low-income people,
- ii. Holistic, family-centered approaches to assessing and addressing individual needs,
- iii. Use of multiple and convenient access points for direct service delivery (most Mississippi community action entities provide multiple locations for client service delivery),
- iv. Provision of multiple and wide-ranging services in order to address the causes and effects of poverty,
- v. Common, entity-wide consumer intake forms and processes and
- vi. Use of community partnerships and inter-entity referral processes to make the most efficient use of available resources.

#### **b) Linkages**

The ability of Mississippi's community action entities to effectively produce outcomes related to the six national goals is intrinsically tied to the creation of a successful system of family and community "linkage."

Mississippi community action entities link individual consumers to multiple resources both within the entity and within the community. It is quite common, for example, for a family to come to a Mississippi community action entity with a presenting issue such as a need for food or utility assistance. Through an initial assessment, needs are mutually identified and the family is informed of available opportunities within the entity (LIHEAP, Weatherization, Head Start, job counseling, family self-sufficiency case management, etc.). Concurrently, entity staff assists the family in identifying and accessing, or "linking" to, additional services available within the community.

Community action entities are required to develop partnerships with social service providers, religious organizations and local governments to, on both a micro- and macro-level, grow the quantity and quality of support and opportunities that are available for those impacted by poverty.

In order to more fully address the needs of families and to evaluate the outcome of their work, Mississippi entities must follow-up with families linked with resources both within and beyond the entity.

c) Coordination with Other Public and Private Resources

Strength of the Mississippi network is the ability of the entities to use their CSBG dollars to leverage additional public and private resources which are then targeted to achieving outcomes within the framework of the six national goals.

In addition to the direct services provided for low-income families and communities, CSBG resources are used to support the infrastructure of Mississippi community action entities. Mississippi's coordinated and comprehensive approaches to eliminating the causes and effects of poverty that are pursued by Mississippi's entities require sound systems of governance and of fiscal and personnel management. CSBG funds allow Mississippi community action entities to develop and maintain these essential systems. The resulting accountability and capacity enable Mississippi entities to access, or leverage, additional public and private resources to further their direct service efforts.

According to the State's 2013 CSBG IS Report, Mississippi community action entities leveraged \$139,194,692. These leveraged resources included public funds from city and county governments, additional Federal dollars, grants from foundations and community-based, grant-making organizations and donations from individual contributors (funding, goods and services).

d) Innovative Community and Neighborhood-Based Initiatives

Mississippi's community action entities have a well-established history of developing innovative and proactive strategies to mitigate the causes and effects of poverty. In FFY 2014, community action entities continue to have an impact through many unique, and innovative, programs made possible by CSBG.

## 2. Community Strength and Needs Assessments

In accordance with the assurance in 676(b)(11) of the Act, MDHS-DCS will secure from each eligible entity in the State, as part of its annual application and as a condition of a financial award, a community action plan which will provide a description of the Community Strengths and Needs Assessment (CSNA) for the community served. The CSNA must be conducted in each county served including citizens from all aspects of the community, public, private, and the poor sector. The CSNA may also include partners, other entities and other programs administered by the entity. The CSNAs are the basis for the ranking of services stated in the community action plan and the budget request.

The community action plan must provide a description of the following:

- a) A description of the comprehensive CSNA to determine the services to be provided based on eligible activities;
- b) A description of outcome measures to be used to monitor success in promoting self-reliance, family stability, and community revitalization.
- c) The entity must state goals and objectives in measurable terms and projected in a quarterly timetable, which indicates when the stated goals and objectives will be accomplished. The strategies employed to achieve the objectives must be adequately described and quantified. This information will also be used in conjunction with Virtual ROMA the Management Information System to measure plan-versus-actual performance levels.
- d) Program activities selected by the eligible entity must be accompanied with a detailed line item budget that describes how CSBG and local and private funds will be effectively used.
- e) A description of the area where new and different methods are to be used in addressing the cause, and/or effect of poverty. A description of what makes this activity different from similar activities and which indicate whether any new concepts, trends, methods, or models are incorporated must be stated in the narrative.
- f) A description of how the entity will provide services during/after a disaster, on weekends, after hours, and during emergencies which must be described in the entities emergency service delivery plan.
- g) A description of how the eligible entity met its prior year's goals and objectives. This report shall include a narrative description of the specific types of projects and activities funded in the prior year CSBG program, and what impact they had on the poverty condition of families and individuals served.

- h) A letter from the auditors which conducted the prior year audit certifying and providing assurances that cost and accounting standards of the Office of Management and Budgets are used by the eligible entity to account for CSBG funds.
- i) An updated governing board of directors and standing committees composition roster.

3. Tripartite Boards - Section 676B (a), (b)

*Board of Directors Composition.* An eligible entities board of directors is governed by 42 USC 9910. The eligible entities board of directors should consist of a minimum of twelve (12) and a maximum of twenty-four (24) members. The board of directors must present a tripartite composition of membership requiring that no less than 1 /3 of the members of the board "are chosen in accordance with democratic selection procedures adequate to assure that these members are representative of low-income individuals and families in the area served." The change in wording from the prior version, which required that these members be representative of "the poor in the area served", reflects an increased emphasis on representation of the neighborhoods which are being served, rather than merely a representation of the larger community. The balance of members should consist of business, labor industry, education, etc., while expanding on and clarifying several of the specific provisions:

- a) Both the elected and the appointed public officials selected by the organizational body on the board shall have general governmental responsibilities which require them to be involved with poverty related matters. The public organizational body official may choose one representative to serve on the board full-time as the public body's official designee. The representative shall be granted full authority to act on behalf of the public body.
- b) Representatives of low-income persons shall be chosen by low-income individuals in accordance with democratic selection procedures adequate to assure that they represent the low- income persons in the geographic area served by the eligible entity. Representatives of low-income persons may be selected to represent either a specific area or neighborhood served by the eligible entity. Among the selection procedures which may be used, either separately or in combination, are nominations and elections either within the neighborhood or within the community as a whole; or, selection at a meeting or conference of low-income persons, such that the date, time and place for a meeting or conference have been adequately publicized.
- c) The eligible entities shall select organizations to be represented on the board in such a manner as to assure that the board will benefit from broad community involvement. Once an organization is selected and indicates its agreement to be represented on the board, it shall choose the person to represent it on the board.

The organizational representatives may be changed only by a majority vote of the board or request of the organizational body to terminate its representation on the board. The by-laws of the eligible entity must include a process for the removal of board members. Anyone representing an organization and/or a business must be a member of the organization or an employee of the business. The organization must be a structured organization with a physical location in the area represented. Appointment or selection of members representing public offices or private organizations shall be made on a revolving or rotating basis to allow total community representation or an opportunity for other interested organizations to nominate a representative to serve.

A person and/or organization can only serve/represent a total of 8 years in all sectors.

Low-income sector board members must be democratically selected by the CSBG Act. The by-laws must describe the selection procedures for low-income representatives. There must be some low-income community involvement in the selection process (e.g., selection "on the basis of some form of democratic procedure, either directly through election, public forum or, if not possible, through a similar democratic procedure process, such as election to a position or responsibility in another significant service or community organization, such as a school PTA, a faith-based organization leadership group, or an advisory board/governing council to another low-income service provider", as is recommended by the Health and Human Services, Office of Community Services Information Memorandum 82).

The entire community must be involved if the mandate of having a measurable and potentially major impact on the causes of poverty to eliminate the effects of poverty is to be met. Therefore, all sectors of the community must be represented on the Board.

Public Officials are included because they represent both the general public and the local government. The success of an eligible entity depends upon its ability to work with and to have the support of this group.

The Poor are included because they know the challenges of poverty. They must participate in programs and activities designed to meet their needs. They must be helped to become empowered if they are to become self-sufficient.

Members of the Private sector are included because they represent the balance of the community. The other groups cannot succeed without the support, resources, and participation of the private sector.

The Board must fully participate in the "development, implementation, and evaluation of the program to serve low-income communities." The revised version also expands on the requirement for a public eligible entity (a government entity) to

have a board of other merchants to assure representation of low-income individuals. The organization may meet this requirement through a board of directors composed of at least one-third individuals chosen through democratic selection procedures who are representative of low-income persons in the neighbor hoods served and "are able to participate actively in the development, planning, implementation, and evaluation of CSBG programs." The public/government organization may also meet this requirement through "another mechanism specified by the state to assure decision making and participation by low-income individuals in the development, planning, implementation, and evaluation of [CSBG] programs." (Community Service Block Grant Act, Subtitle B—Community Service Block Grant, Sec. 676 (b) (2)).

Board members must meet at least bi-monthly and convene special or call meetings as needed.

In accordance with the CSBG Act, MDHS-DCS requires a demonstration that tripartite board members actively participate in the development, planning, implementation and evaluation of the community action program rather than merely provide advice.

Newly elected or appointed board members must submit to twelve hours of specified training relative to federal, state, and local laws, policies, procedures and other governance of eligible entities, entity by-laws, finance, audit, program and board liabilities and responsibilities. This training must take place sixty (60) days after the official seating of member. Board members must submit to eight hours of annual training on the aforementioned areas to be kept abreast of the most recent guidance, information and trends in nonprofit governance.

Board members not meeting these criteria must be removed within fifteen (15) days of official notice of non-compliance.

Each member selected to serve on the Board of Directors must live in that eligible entities CSBG designated service area. Members selected to represent a specific geographic area must live in that area. Board of Directors contact information must be posted on the eligible entities website, thereby enabling community access.

Every county in the service area shall be equally represented on the Board unless otherwise approved by DCS. Each Board shall have an equitable cross section of representation in the service area unless otherwise approved based on population.

Eligible entities should specify in the by-laws particular public officials who may serve on the board. The Board chooses public sector representatives based on the needs at the time. The eligible entities must first look to elected officials. If not enough elected officials are reasonably available and willing to serve, the eligible entities may look to appointed officials (i.e., government officials who were not elected). Eligible entities are not restricted to choosing county commissioner, city

mayors or council members as their elected officials; they may choose other elected officials as well (e.g., city or county board of education members, etc.). If a public body chooses a representative to serve as a board member, that person, is the board member and gets to vote at the board meeting.

The state requires that a public official or representative of a public office, poor or private sector representative shall be elected or appointed, respectively, to serve no more than two (2) lifetime four year terms. However, the board member must be re-elected or appointed to serve the second term. The two terms can be continuous or there may be a break in service. The member can serve no more than eight (8) years in a lifetime. Otherwise, members serving less than eight years will be allowed up to the lifetime limit of eight years. Eligible entities are encouraged to stagger four year term expirations, allowing a reasonable departure of board members during different periods, whereas not to create a governance, compliance, or service delivery problem.

Each board seat must be filled within a sixty (60) day period after the seat has been declared vacant by removal, resignation, etc., unless a written request for waiver has been granted within the sixty (60) day period from DCS. It is further the responsibility of the Board to notify DCS in writing within ten (10) days of any Board membership changes.

Each Board shall provide DCS with a continuous current/update membership roster with supporting documentation maintained on file (eligible entities office) regarding official elections or appointments.

Eligible entities may consider not seating former employees as board members. If so, require them to have left employment for at least one year before joining the board. Entities must prohibit former employees who have been terminated from serving on the board.

Eligible entities should prohibit board members who are federal/state employees from serving in any capacity that would require them to act as an agent for the eligible entity in the dealings with any federal/state government departments or entities.

The by-laws shall list the total number of seats on the board and the allotment of seats to the public officials, representatives of low-income sector and representatives of the private sector.

The by-laws must include procedures for selection of board members. Procedures for the selection of representatives of the low-income sector must ensure that all areas of the low-income community will be represented.

The by-laws must describe any performance standards (such as attendance, etc.) for members of the board, the violation of which may be grounds for removal. These shall include standards of conduct for board members. The standards of conduct

shall specify conditions under which board members may be sanctioned and/or removed.

The by-laws shall include procedures for selecting new board members in the case of a vacancy on the board. For the purpose of this paragraph, there is a vacancy when a term has expired, a member has been notified of his or her official removal by the board, a member submits his or her resignation, or a member who is an appointed public/elected official leaves office. All vacancies shall be filled within 60 calendar days.

The quorum for a meeting of the board shall be at least 50 percent +one of the seats on the board. The board members must meet bi-monthly. The meetings shall be scheduled for the convenience of its members and of the general public. The eligible entities shall provide notice (in writing) of any meeting and an agenda to all members at least 5 calendar days in advance. Electronic notices and agendas, in lieu of paper copies, will also be accepted, provided all members receiving electronic notices have agreed to accept this form of notification. Meeting notices and agendas shall be submitted to MDHS/DCS at the time they are submitted to the board and made available to the general public. The contact information of all board members must be posted on the eligible entities website.

All meetings of the board are subject to the State Open Meetings Act. The board shall conduct its business and keep written minutes of each meeting in accordance with Robert's Rule of Order. Minutes shall be made available to the public upon request. The board shall also make available to the public, upon request, translations of the minutes in the appropriate language where a significant portion of the low-income population does not speak English.

Copies of the minutes of each meeting shall be submitted to the MDHS/DCS program no later than 10 calendar days after the date of the meeting at which those minutes were ratified. If the meeting was not a quorum, the official minutes must be submitted within 3 calendar days of the scheduled meeting.

The Board of Directors may set up as many subcommittees as it requires in order to carry out the responsibilities effectively. The committees - standing and ad hoc must meet the eligible entities current needs. It is required that the Board has at least five Standing Committees. They are: (1) Executive; (2) Planning and Evaluation; (3) Finance; (4) Personnel and; (5) Human Rights Committees. The Board may also change the description of the activities of the standing committees as needed to meet their perspective.

- a) The Executive Committee is responsible for the general conduct of the Board's business on a day to day basis. The major functions of this committee are to act upon urgent matters in a timely manner, establish standing committees and assign members to each, review the major administrative policies and recommend changes or additions to the full Board, provide for adequate legal

counsel for the eligible entity, and to evaluate the eligible entities executive director. The evaluation must be on file with the eligible entity and with the board. All responsibilities are subject to the approval of the full board with instructions.

- b) The Planning and Evaluation Committee develops strategies for planning and achieving objectives and makes continual evaluations of the eligible entities operational goals. The functions of this committee include ensuring that an adequate needs assessment is completed, reviewing and approving programs to be operated by the eligible entity, developing internal reporting standards for programs, recommending funding of specific programs to the full Board, evaluating each program or project on a timely basis, and coordinating efforts of the public and private organizations and the committees in the service area in providing assistance to the eligible entity and to the poor.
- c) The Finance Committee oversees the fiscal functions of the eligible entity. This committee reviews budget proposals prepared by the eligible entity staff and makes recommendations to the Board regarding these proposals, reviews the monthly budget status and the financial reports, ensures that an adequate fiscal management system is in place, assists in securing alternate sources of funding, to review and make recommendations of action needed to the board regarding monthly expenditures, and reports to the full Board on all fiscal matters.
- d) The Personnel Committee is responsible for overseeing personnel functions and certain administrative functions of the eligible entity. The duties of this committee include the review of personnel policies regarding promotions; salary; hiring of employees recommended by the Executive Director; serve the selection committee making recommendations to the full Board when employing an Executive Director; and the promotion of a Career Development Program for professional and non-professional staff.
- e) The Human Rights Committee acts on matters concerning the rights of employees and management. Listening, hearing, fact-finding and providing objective judgments are the core functions of this committee. Other functions include ensuring the protection of the rights of both the eligible entity and the employees as established in the eligible entities Equal Opportunity Plan and recommending approval or denial of it to the Board, hearing equal opportunity complaints and recommending to the Board possible solutions and ensuring due process prior to the termination of an employee.

The board may establish any committee it considers necessary for carrying out its business. Each sector of the board must be fairly represented on such committees. Voting by proxy is not permitted at meetings of the board or of its committees. This prohibition applies to all members of the board.

Each committee membership should reflect the total composition of the Board. Since the full Board establishes committees in order to divide the workload, develop expertise among their members, and to permit decision-making between meetings, careful attention should be made to committee assignments. It is also important that each entity have a board development plan in place to assure adequate membership selection, participation and availability of a knowledgeable group of individuals.

The Board must develop strong removal provisions in the bylaws, consistent with state nonprofit corporation law, which often specifies special notice and other procedural requirements for removal.

The board can remove any director or officer for cause, including but not limited to, for example, false certifications on the application, unexcused absences from a certain number (e.g. three) of consecutive board meetings, failure to comply with the eligible entities conflict of interest policy, and taking actions that are against the best interests of the organization. Eligible entities may consider incapacity as a ground for removal.

Boards should develop a policy that establishes procedures for identifying potential conflicts of interests and determine if a particular transaction that could involve a conflict is in the organization's best interest. The by-laws should require the board to develop and maintain a conflict of interest policy.

All boards must comply with 79-11-509 of the Mississippi Code which governs non-profit corporations.

Eligible entities failure to adhere to said requirements for board of directors maybe declared non-compliant, resulting in a notice to terminate funding.

#### 4. State Charity Tax Program

*Earned Income Tax Credit (EITC) Project*, All eligible entities must provide a plan for EITC and describe how it will be incorporated into case management for clients.

#### 5. Programmatic Assurances

States making application for Federal CSBG funds are required to not only sign and include the complete list of Federal assurances with their annual State Plan, but are also required to describe how the State will comply with each assurance. The Mississippi description of compliance follows.

- a) Assurance 676(b) (1) – Funds made available through the grant or allotment will be used:

- i. To support activities that are designed to assist low-income families and individuals, including families and individuals receiving assistance under part A of title IV of the Social Security Act, homeless families and individuals, migrant or seasonal farm-workers, and elderly low-income individuals and families to enable families and individuals to:
  - 1) remove obstacles and solve problems that block the achievement of self-sufficiency (including self-sufficiency 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);
  - 2) secure and retain meaningful employment;
  - 3) attain an adequate education, with particular attention toward improving literacy skills of the low-income families in the communities involved, which may include carrying out family literacy initiatives;
  - 4) make better use of available income;
  - 5) obtain and maintain adequate housing and a suitable living environment;
  - 6) obtain emergency assistance through loans, grants or other means to meet immediate and urgent family and individual needs and
  - 7) achieve greater participation in the affairs of the communities involved, including the development of public and private grassroots partnerships with local law enforcement entities, local housing authorities, private foundations and other public and private partners to document best practices based on successful grassroots intervention in urban areas, to develop methodologies for widespread replication and strengthen and improve relationships with local law enforcement entities, which may include participation in activities such as neighborhood or community policing efforts.
- ii. To address the needs of youth in low-income communities through 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 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 after-school child care programs; and

- iii. To make more effective use of, and to coordinate with, other programs.

**COMPLIANCE:** MDHS-DCS will ensure compliance with this Assurance through its partnerships with the State's eighteen (18) eligible entities. Importantly, these partnerships and the subsequent provision of CSBG funding, allows each entity to execute their respective community action plan.

MDHS-DCS has partnered with the eligible entities to produce a Plan. The Plan is the vehicle through which the partners meet the requirement for participation in Results Oriented Management and Accountability. The Plan requires entities to identify programmatic targets related to the six national goals and to track outcomes in accordance with the national indicators.

The Plan is a comprehensive method for ensuring CSBG and related services are appropriately targeted to identify needs and that services and strategies are successful in achieving meaningful outcomes for low-income families and communities. Thus, one of the ways in which MDHS-DCS will assure compliance with the Assurance is through support of the network's adherence to the Plan.

Performance of eligible entities will be monitored and evaluated through quarterly and annual progress reports (which compare actual outcomes with anticipated outcomes), through the training and technical assistance conducted by the MDHS-DCS.

The State's client eligibility requirement will be 125% of the Federal Poverty Guidelines as determined by current federal guidelines. Live-in attendant income can be excluded if it is determined that (1) the live-in is essential to the care and well-being of the person; and (2) would not otherwise be living in the unit except to provide the necessary supportive services.

- b) Assurance 676(b)(4) – 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.

**COMPLIANCE:** MDHS-DCS will carry out this Assurance by assisting eligible entities in evaluating emergency and non-emergency nutritional needs. Such assistance will be provided through review of entity applications and community action plans as well as through regular sharing of community-based or statewide information as it is known.

The entities will be required to coordinate with local soup kitchens, food banks and also the area of direct assistance that will allow purchases of hard-to-secure supplies, nutritious foods and related services. The entities are also required to provide a copy of their emergency service plan to meet the needs of their clients.

The entities are required to partner with their local DHS Economic Assistance offices to refer client for expedited services in emergency situations. If SNAP benefits cannot be provided that same day, entities must provide assistance by giving food vouchers for emergency nutritional needs.

- c) Assurance 676(b)(5) – The State and the 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 to low-income individuals and to avoid duplication of such services, and a description of how the State and the eligible entities will coordinate the provision of employment and training activities, as defined in section 101 of such Act, in the State and in communities with entities providing activities through statewide and local workforce investment systems under the Workforce Investment Act of 1998;

**COMPLIANCE:** The development and use of effective partnerships is the intent of National Goal 4 – Partnerships among supporters and providers of services to low-income people are achieved. Through adherence to the Plan, which embraces this and the other national goals, MDHS-DCS will assure that the linkages included in the Assurance are coordinated and established.

Where entities provide employment and training services, monitoring will include an evaluation of the entities coordination of such services with entities providing activities through statewide and local workforce investment systems. Additionally, MDHS-DCS will maintain a relationship with statewide workforce investment entities and will be available to represent CSBG in those settings.

The State will require entities to coordinate and establish linkages between governmental and other social services programs to assure the maximum effectiveness in delivery and to avoid duplication. Entities must coordinate with Internal Revenue Services, a plan to assist low income families access Earn Income Tax Credit and encouraged to participate with local financial institutions in the set-up of Individual Development Accounts. The entities are requested to secure leveraging dollars which can be counted through the services provided by other entities. The entities will also be requested to provide a description of how it will coordinate with local employment services/training entities and workforce investment organizations performing under the Workforce Investment Act of 1998.

- d) Assurance 676(b)(6) – The State will ensure coordination between anti-poverty 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 communities.

**COMPLIANCE:** MDHS-DCS, through its embrace and endorsement of the Plan, actively supports coordination of anti-poverty programs within the State.

Since the Mississippi Low-Income Home Energy Assistance Program (LIHEAP) is delivered by community action entities and other organizations, and is, in fact, administered by all except one (1) entity, coordination between CSBG and LIHEAP must be intentionally planned for and achieved. Eligible entities are required, in their annual applications, to describe how they will coordinate with emergency energy crisis intervention programs at the local level. Coordination is verified during CSBG monitoring. Additionally, State-level CSBG representatives meet, periodically through the year, with State LIHEAP representatives and other entities that focus on energy needs of low-income individuals/families. The intent is to ensure appropriate coordination of effort and service.

The State ensures coordination of services between anti-poverty programs in each community through the partnerships requested from social services entities. The entities are requested to work closely with energy providers that serve their areas. The entities are requested to provide energy saving materials and Consumer Education Conservation Workshops. The entities are also requested to submit to the state a list of services and partners available to meet the needs of their clients, to include the provider's name, address, phone number and contact person.

- e) Assurance 676(b)(9) – The State and eligible entities 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.

**COMPLIANCE:** The State requires each eligible entity to establish partnerships through bilateral agreements that will address specific services to be provided by the eligible entity and the partner. Mississippi community action entities have a long history of working in partnership with a variety of groups, organizations and institutions. Many of these groups are represented on entities' boards of directors/administering board. Included are banks, chambers of commerce, child care providers, civic groups, faith-based organizations, governmental entities, health care institutions and practitioners, neighborhood groups, schools, service providers, private foundations, professional associations and unions.

MDHS-DCS encourages the Mississippi community action entities to minimally develop and implement formal partnerships with LIHEAP and Weatherization service providers, Head Start, WIN Job Center, Community Colleges, local school districts, Area Entity on Aging, local MDHS office, primary health care centers and legal services to assure adequate access to services are made available to low-income citizens.

## **G. Fiscal Controls and Monitoring**

### **1. State Program Monitoring**

The State of Mississippi continues to utilize an established monitoring plan to ensure financial and programmatic accountability, and adherence to federal/state regulations.

The programmatic monitoring system has been designed to provide a systematic method of identifying program strengths and weaknesses, a basis for assisting entities by improving program operations and for continuing the flow of information between the entity level and DCS which is necessary for problem identification and resolution.

The State will conduct on-site monitoring visits of each entity at least once annually. Monitoring visits will normally be scheduled and confirmed at least one week prior to the visit. However, the State does reserve the right to conduct unscheduled monitoring visits. Programmatic and Fiscal Monitoring functions are performed by the Division of Program Integrity (DPI), a division within the MDHS.

An entrance conference will be conducted with the entities Executive Director or a designee to explain the purpose of the visit. Program operations of entities are reviewed by the Division of Program Integrity. These internal audits are conducted in accordance with the General Accounting Office's "Standards for Audits of Governmental Organizations, Programs, Activities, and Functions" and generally accepted auditing standards established by the American Institute of Certified Public Accountants.

A written report of the visit is prepared by DPI for the Director of DCS to review before a copy is sent to the entity. All noted findings are communicated to the entity in writing within 30 days. The entity has 30 days to respond to any deficiencies noted. Deficiencies in program operations which are not properly corrected according to instructions may result in suspension of funds or termination.

Each entity is required to contract with an independent audit firm for the purpose of auditing funds received through CSBG by using the approved process as provided by MDHS/DCS. Entity must follow the approved procurement process for solicitation of auditors annually.

## 2. DCS Training and Technical Assistance

Mississippi adopts the belief that CSBG provides flexible core of foundational funding that enables entities to operate. Though CSBG funding may represent a small portion of entities total revenue, it is the source of an entities identity as a community action entity. All entity operations benefit from the State's community action entity designation, and subsequent CSBG funding, and the systems supporting those operations are subject to review and evaluation by the MDHS-DCS.

The state has established a plan for providing financial training and technical assistance to ensure program accountability and quality workmanship. The state anticipates at least two training sessions during program year 2015 and because of the importance of these issues, attendance will be mandatory.

The Division of Community Services (DCS) performs reviews once every two (2) years; from the reviews, DCS develops a Training and Technical Assistance (T&TA) plan specific to the needs of the agency.

Any deficiencies noted by the DCS Compliance Unit will be forwarded to DPI for resolution and/or investigation if adequate responses are not provided to DCS upon request or in a timely manner. The entity has 30 days to respond to any deficiencies noted.

The state will provide technical assistance to entities to help in the correction of deficiencies before undertaking a reduction of funding in accordance with OMB circulars A102 and A110 which also suggest technical assistance as a means of correcting deficiencies in high risk entities or a part of an action to enforce regulations.

A training and technical capacity is key to resolving monitoring and audit findings. Training and technical assistance is an ongoing approach to ensure an entity meets performing standards. Some approaches to implement capacity building efforts, include the following: annual state-wide or regional training conferences and frequent informal meetings and discussions between CSBG manager and entities' executive directors, boards and local state boards.

On-site visits provide an excellent opportunity to assess the technical needs of entities through the notation of program deficiencies. Entities are encouraged to attend all national, regional and/or state workshops. Technical assistance is provided continuously throughout the year. Each entity has access to a direct toll-free telephone line to the Division of Community Services for immediate technical assistance from any location in the State. The State will partner with the State CAA Association to address state wide training needs.

State staff personnel are kept abreast of major changes affecting the program through attendance at state, regional and national conferences.

3. Corrective Action, Termination and Reduction of Funding

In carrying out termination and/or reduction procedures, DCS will comply in all respects with the CSBG Act.

4. Fiscal Controls, Audits and Withholding

The State of Mississippi has established fiscal controls and fund accounting procedures necessary to assure the proper disbursement of and accounting for Federal CSBG funds paid to the State, including procedures for monitoring the funds provided to entities. These controls and procedures are through an annual audit. Audits are conducted and reported in accordance with Generally Accepted Auditing Standards (GAAS), Government Auditing Standards (GAS) and Circular A-133, as applicable, and copies of the auditor's reports, and any management letters issued by the auditors, are submitted to the Division of Program Integrity (DPI) - Office of Monitoring and Division of Community Services (DCS) within nine (9) months after the end of the subgrantee's fiscal year.

DCS ensures that cost and accounting standards of the Office of Management and Budget (OMB) apply to recipients of CSBG funds by including this information in the CSBG grant award document and by reviewing annual audits prepared for each eligible entity.

- a) Assurance 676(b) (7) – The State will permit and cooperate with Federal investigations undertaken in accordance with section 678D of the Act.

**COMPLIANCE:** MDHS-DCS and the State of Mississippi will permit and fully cooperate with Federal investigations undertaken in accordance with section 678D of the Act.

- b) Assurance 676(b)(8) – 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 review by the Secretary as provided in section 678C(b);

**COMPLIANCE:** The CSBG/LIHEAP Policy Manual contains procedures governing termination or reduction of funding to eligible entities. The procedures are in compliance with Assurance 676(b) (8). The State ensures any eligible entity that was funded in the previous year under this Act will not have its present or future funding terminated under this Act, or reduced below the

proportional share of funding it received in the previous fiscal year, unless after providing notice and an opportunity for a hearing on the record, the State determines that cause existed for such termination or such reduction subject to the procedures and review by the Secretary as provided in Section 678C (b).

The same information on appeal procedures is included in the terms and provisions that are attached to each eligible entity approved subgrant agreement.

- c) Assurance 676(b) (10) – 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.

**COMPLIANCE:** The CSBG/LIHEAP Policy Manual requires each eligible entity to have established, documented procedures allowing interested organizations to petition for representation on the entities board of directors or as applicable, the administering board. Compliance is verified through monitoring conducted by MDHS-DCS.

## **H. Accountability and Reporting Requirements**

### **1. Results Oriented Management and Accountability**

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

Through this State Plan, the Mississippi Department of Human Services-Division of Community Services (MDHS-DCS) commits to directing its CSBG resources and activities toward achieving measurable outcomes in six overarching goals. These goals represent a nationwide commitment within the community action network and they are fully embraced by Mississippi community action entities. The six goals are:

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

The Mississippi CSBG enables vital partnerships between community action entities and low-income people and communities. Community action entities create opportunities for low-income people to transcend poverty and achieve economic self-reliance.

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

MDHS-DCS ensures that CSBG resources are used by the State's community action entities to facilitate improvements in the physical, emotional, economic and social conditions in which low-income people live.

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

MDHS-DCS encourages community action entities to actively assist low-income individuals in becoming active, involved citizens.

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

MDHS-DCS actively seeks opportunities within State government to link the work of CSBG with other programs and entities focused on the needs and concerns of low-income families.

MDHS-DCS encourages statewide collaborations through its support of Head Start, Legal Services and Community Health Centers. Additionally, MDHS-DCS encourages community action entities to develop meaningful partnerships within the communities they serve. To that end, partnership data is an element within the quarterly reports required of community action entities.

Goal 5 Entities increase their capacity to achieve results.

MDHS-DCS is supportive of entities' on-going development of the capacities that lead to positive results for low-income people and communities. MDHS-DCS provides training and technical assistance and it partners with other entities to strengthen individual entities and the statewide CSBG network. Discretionary funds are used for capacity-building activities within individual entities and across the network.

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

MDHS-DCS supports community action entities as they work within their communities to develop and provide service systems that are supportive of vulnerable populations.

Through analysis of progress toward these six goals, MDHS-DCS measures its success in meeting the intent and purposes of the CSBG Act.

**COMPLIANCE:** As of October 1, 2001, Mississippi was in compliance with requirements for outcomes measurement and reporting. Mississippi has fully embraced Results Oriented Management and Accountability (ROMA). In Program

Year 2005, MDHS-DCS; the eligible entities were mandated to utilize the revised case management approach as a blueprint for service delivery along with the ROMA compliant reporting format. Subsequently, a single plan for data collection was deployed state-wide. The data is regularly reviewed by its user group. Best practice is shared and suggestions for improvement, to the network's data collection efforts, are always being reviewed. DCS's commitment to ROMA and its monitoring procedures ensure that the State of Mississippi's CSBG-eligible entities continue their compliance with this Assurance.

## 2. Annual Report

The Mississippi CSBG Program must submit an annual report to OCS in the form of the annual NASCSP CSBG Information System Report. The most recent CSBG IS Report was submitted in March, 2014. The next CSBG IS Report will be submitted by the end of March, 2015.

## 3. Organizational Standards

The State of Mississippi has adopted the draft CSBG Organizational Standards developed by the Center of Excellence. These standards will be used to assess and monitor eligible entities to assure the level of accountability to promote quality among Mississippi's eligible entities.

The State, in conjunction with the State CAA Association, has received training and assistance from the RPIC lead state, Georgia, regarding the standards. Eligible entities were notified of the State's intent to implement the standards at the public hearing and given the opportunity to comment. The State has required the eligible entities to conduct an internal assessment using the standards, and will provide T&TA in the areas of deficiency.

The State has incorporated the standards in its T&TA document for desk reviews and field reviews. We are meeting with the Division of Program Integrity to modify the monitoring tool to incorporate the standards. Board of Director training is being scheduled for this year, and the state will work with them to incorporate the standards into their bylaws and operational procedures. Eligible entities will be monitored on the standards beginning program year 2015 which begins January 1, 2015. Our goal is to meet at least 75% of the standards for 2015, and 100% for 2016.

# **APPENDIX A**

## **Letter of Designation**



**PHIL BRYANT**  
GOVERNOR

May 7, 2013

Ms. Jeannie Chaffin, Director  
Office of Community Services  
Administration for Children and Families  
U. S. Department of Health and Human Services  
370 L'Enfant Promenade, S. W., 5<sup>th</sup> Floor, West  
Washington, D. C. 20447

Dear Ms. Chaffin:

I hereby authorize Mr. Richard A. Berry, Executive Director of the Mississippi Department of Human Services (MDHS), to be the official signature authority for all funds appropriated to MDHS by the U. S. Department of Health and Human Services. In addition, I authorize Mr. Berry to sign all assurances for the Community Service Block Grant and Low-Income Home Energy Assistance Program (LIHEAP) grant applications outlined in the respective statute, as amended. To comply with the LIHEAP statute, Mr. Berry is duly authorized to certify that MDHS will comply with the 16 assurances contained in the LIHEAP Act, Title XXVI of the Omnibus Budget Reconciliation Act of 1981 as amended, in the administration and operation of its Low-Income Home Energy Assistance Program.

The Director of the Division of Community Services, Ms. Tina Ruffin, will serve as the state liaison for the implementation of the Community Services Block Grant and the Low-Income Home Energy Assistance Programs. All routine correspondence from your office should be directed to Ms. Ruffin and you may contact her directly at P. O. Box 352, Jackson, Mississippi 39205 or telephone (601) 359-4768.

Sincerely,

A handwritten signature in black ink that reads "Phil Bryant".

Phil Bryant

PB:RAB:tr

cc: Richard A. Berry, Executive Director  
Mississippi Department of Human Services

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STATE OF MISSISSIPPI • OFFICE OF THE GOVERNOR

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# **APPENDIX B**

## **Administrative Certifications**

**Certification Regarding Lobbying  
Department of Health and Human Services**

**Administration for Children and Families**

**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 any entity, 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 entity, 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.

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 and officer or employee of an 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.

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Richard A. Berry, Executive Director  
Mississippi Department of Human Services

---

Date

## **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. If necessary, the prospective participant shall submit an explanation of why it cannot provide the certification. The certification or explanation will be considered in connection with the Department of Health and Human Services' (HHS) determination whether to enter into this transaction. However, failure of the prospective primary participant to furnish a certification or 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 HHS determined that the prospective primary participant knowingly rendered an erroneous certification in addition to other remedies available to the Federal Government, HHS may terminate this transaction for cause or default.
4. The prospective primary participant shall provide immediate written notice to the HHS entity 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: 45 CFR Part 76. See the attached definitions.
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 debarred, suspended, declared ineligible, or voluntarily excluded from participation in this covered transaction, unless authorized by HHS.
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 Exclusion - Lower Tier Covered Transactions," provided by HHS, without modification, in all lower tier covered transactions and in all solicitations for lower tier covered transactions.
8. A participant in a covered transaction may rely upon a certification of a prospective participant in a lower tier covered transaction that it is not 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 Non-procurement List (of excluded parties).
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 suspended, debarred, ineligible, or voluntarily excluded from participation in this transaction, in addition to other remedies available to the Federal Government, HHS 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 from covered transactions by any Federal department or entity;
  - (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 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 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.

---

Richard A. Berry, Executive Director  
Mississippi Department of Human Services

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Date

## **CERTIFICATION REGARDING DRUG-FREE WORKPLACE REQUIREMENTS**

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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 pint 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.

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### 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 not 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 Non-procurement 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 ten calendar days after receiving notice under paragraph (d)(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;
  - (f) Taking one of the following actions, within 30 calendar days of receiving notice under paragraph (d)(2), with respect to any employee who is so convicted –
    - (1) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
    - (2) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;
  - (g) Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs (a), (b), (c), (d), (e) and (f).
- (B) The grantee may insert in the space provided below the site(s) for the performance of work done in connection with the specific grant:

Place of Performance (Street address, city, county, state, zip code)

**750 North State Street**

**Jackson, MS 39202 (Hinds County)**

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]

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Richard A. Berry, Executive Director  
Mississippi Department of Human Services

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Date

## **ENVIRONMENTAL TOBACCO SMOKE CERTIFICATION**

Public Law 103-227, Part C, Environmental Tobacco Smoke, also known as the Pro-Children Act of 1994 (Act), requires that smoking not be permitted in any portion of any indoor facility owned or leased or contracted for by an entity and used routinely or regularly for the provision of health, day care, education, or library services to children under the age of 18 or if the services are funded by Federal programs either directly or through States 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 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.

---

Richard A. Berry, Executive Director  
Mississippi Department of Human Services

---

Date

# **APPENDIX C**

## **Annual Audit**



RECEIVED

MAR 14 2014

DEPUTY ADMINISTRATOR

**STATE OF MISSISSIPPI  
OFFICE OF THE STATE AUDITOR  
STACEY E. PICKERING  
AUDITOR**

March 10, 2014

**Single Audit Management Report**

Richard Berry, Executive Director  
Mississippi Department of Human Services  
P. O. Box 352  
Jackson, MS 39205

Dear Mr. Berry:

Enclosed for your review are the single audit findings and other audit findings for the Mississippi Department of Human Services for Fiscal Year 2013. In these findings, the Auditor's Office recommends the Mississippi Department of Human Services:

Single Audit Findings:

1. Strengthen controls over compliance with allowable costs requirements of the CCDF Cluster;
2. Strengthen controls over compliance with eligibility and benefit payment requirements of the TANF Program;
3. Strengthen controls to ensure compliance with eligibility requirements of the CCDF Cluster;
4. Strengthen controls over compliance with Federal Funding Accountability and Transparency Act (FFATA) Reporting for the SSBG Program;
5. Ensure on-site monitoring for the CCDF Cluster is properly performed;
6. Strengthen controls over reporting of subawards for FFATA requirement for the TANF Program and CCDF Cluster;
7. Strengthen controls over on-site monitoring;
8. Strengthen controls over subrecipient monitoring for OMB Circular A-133 audits;

Other Audit Findings:

9. Strengthen controls over 20 percent exemption and five-year time limit for the TANF Program;
10. Strengthen controls over termination of benefits for non-participation of work-eligible adults in the work activities program of the TANF Program;
11. Strengthen controls for the review of employee approval levels in the Statewide Automated Accounting System (SAAS); and
12. Strengthen controls over the data collection and submission of required federal reporting elements and report for the TANF Program.

Please review the recommendations and submit a plan to implement them by March 21, 2014. The enclosed findings contain more information about our recommendations.

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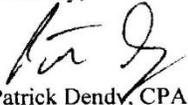
Mississippi Department of Human Services  
March 10, 2014  
Page 2

During future engagements, we may review the findings in this management report to ensure procedures have been initiated to address these findings.

The purpose of this report on internal control over compliance is solely to describe the scope of our testing of internal control over compliance and the results of that testing based on the requirements of OMB Circular A-133. Accordingly, this report is not suitable for any other purpose. However, this report is a matter of public record and its distribution is not limited. The Office of the State Auditor has also issued an Information Systems Management Report on the Mississippi Department of Human Services dated March 10, 2014. That report should be read in conjunction with this report.

I hope you find our recommendations enable the Mississippi Department of Human Services to carry out its mission more efficiently. I appreciate the cooperation and courtesy extended by the officials and employees of the Mississippi Department of Human Services throughout the audit. If you have any questions or need more information, please contact me.

Sincerely,



Patrick Dendy, CPA  
Director, Department of Audit

Enclosures

# **APPENDIX D**

## **List of Eligible Entities**

**MISSISSIPPI DEPARTMENT OF HUMAN SERVICES  
COMMUNITY ACTION ENTITIES  
FOR CSBG**

**AJFC**

**Chief Executive Officer, Sandra Sewell  
P.O. Box 3011  
1038 N. Union, Bldg. A.  
Natchez, MS 39120  
(601) 442-8681 or 1-866-243-0041**

Adams	(601) 442-8681	Claiborne	(601) 437-5419
Copiah	(601) 894-4745	Franklin	(601) 384-5587
Jefferson	(601) 786-3711	Lawrence	(601) 587-4370
Lincoln	(601) 833-6349		

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**Bolivar County**

**Executive Director, Elnora Littleton  
810 East Sunflower Road  
Suite 120  
Cleveland, MS 38732  
(662) 846-1491 or 1-800-743-2901**

Bolivar (662) 846-1491

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**Central Mississippi, Inc.**

**Executive Director, Pamela Gary  
101 South Central Ave.  
Winona, MS 38967  
(662) 283-4781 or 1-800-898-0410**

Attala	(662) 289-5934	Carroll	(662) 464-5667
Grenada	(662) 226-7953	Holmes	(662) 834-2437
Leflore	(662) 455-3497	Montgomery	(662) 283-2698
Yalobusha	(662) 226-7953		

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**Coahoma Opportunities, Inc.**

**Executive Director, Edward Seals  
115 Issaquena Ave.  
Clarksdale, MS 38614  
(662) 624-4887**

Coahoma (662) 624-4887

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**Gulf Coast Community Action Agency**  
**Executive Director, Dr. Barbara Coatney**  
**500 24<sup>th</sup> Street**  
**Gulfport, MS 39502**  
**(228) 896-1409 or 1-888-603-4222**

George	(601) 947-7426	Greene	(601) 394-2942
Hancock	(228) 896-1409	Harrison	(228) 896-1409
Stone	(228) 896-1409		

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**Hinds County Human Resource Agency**  
**President/CEO, Kenn Cockrell**  
**258 Maddox Road**  
**Jackson, MS 39212**  
**(601) 923-3930 or (601) 923-3950**

Hinds (601) 923-3950

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**Jackson County CAC**  
**Executive Director, Diann Payne**  
**5343 Jefferson Street**  
**Moss Point, MS 39562**  
**(228) 769-3292**

Jackson (228) 769-3292

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**LIFT, Incorporated**  
**Executive Director, Dorothy Leasy**  
**2577 McCullough Blvd.**  
**Belden, MS 38826**  
**(662) 842-9511 or 1-800-844-5435**

Calhoun	(662) 412-2222	Chickasaw	(662) 447-2089
Itawamba	(662) 862-4894	Lafayette	(662) 234-4568
Lee	(662) 842-9511	Monroe	(662) 369-4695
Pontotoc	(662) 489-7329	Union	(662) 534-8104

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**Mid-State Opportunity CAA**  
**Executive Director, Helen Bell**  
**204 North Church Street**  
**Charleston, MS 38921**  
**(662) 647-2463 or 1-800-523-6683**

Desoto	(662) 895-4153	Panola	(662) 487-3076
Quitman	(662) 326-8131	Tallahatchie	(662) 647-2463
Tate	(662) 562-7733	Tunica	(662) 363-2751

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**Multi-County CSA**  
**Interim Executive Director, Angela Hicks**  
2906 St. Paul Street  
Meridian, MS 39302  
**(601) 483-4838 or 1-800-898-0659**

Clarke	(601) 776-3461	Jasper	(601) 784-4844
Kemper	(601) 743-5752	Lauderdale	(601) 482-9887
Neshoba	(601) 656-7261	Newton	(601) 683-2733
Scott	(601) 469-3061	Smith	(601) 782-9578
Wayne	(601) 735-3470		

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**Northeast MS CS**  
**Executive Director, Steve Gaines**  
801 Hatchie Street  
Booneville, MS 38829  
**(662) 728-2118 or 1-877-728-2118**

Alcorn	(662) 286-9263	Marshall	(662) 252-2713
Prentiss	(662) 728-2118	Tishomingo	(662) 423-7013

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**PRVO**  
**Executive Director, Helmon Johnson**  
756 Highway 98 Bypass  
Columbia, MS 39429  
**(601) 736-6077 or 1-866-736-9564**

Covington	(601) 765-4871	Forrest	(601) 544-1394
Jefferson Davis	(601) 792-5356	Jones	(601) 428-3171
Lamar	(601) 794-8387	Marion	(601) 736-6077
Pearl River	(601) 749-7729	Pearl River	(601) 403-2206
Perry	(601) 964-8231		

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**Prairie Opportunity**  
**Executive Director, Laura Marshall**  
501 Hwy. 12 West  
Suite 110  
Starkville, MS 39759  
**(662) 323-3397 or 1-888-397-5550**

Choctaw	(662) 285-6291	Clay	(662) 494-4862
Leake	(601) 267-4510	Lowndes	(662) 328-1669
Noxubee	(662) 726-4861	Oktibbeha	(662) 323-3397
Webster	(662) 258-8233	Winston	(662) 773-3465

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**South Central Community Action Agency**  
**Executive Director, Sheletta Buckley**  
**P.O. Box 129**  
**110 Fourth Street**  
**D'Lo, MS 39062**  
**(601) 847-5552 or 1-866-313-2905**

Madison	(601) 407-5473	Rankin	(601) 824-8844
Simpson	(601) 847-5552		

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**Southwest Mississippi Opportunities**  
**Executive Director, Bill Franklin**  
**P.O. Box 1667**  
**223 3<sup>rd</sup> Street**  
**McComb, MS 39648**  
**(601) 684-5593 or 1-800-250-7730**

Amite	(601) 225-7878	Pike	(601) 684-5593
Walthall	(601) 876-4511	Wilkinson	(601) 888-4211

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**Sunflower-Humphreys Counties Progress**  
**Chief Executive Officer, Louise Lloyd**  
**414 Martin Luther King Dr.**  
**Indianola, MS 38751**  
**(662) 887-5659 or 1-888-677-1461**

Humphreys	(662) 247-1961	Sunflower	(662) 887-5659
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**United CAA**  
**Executive Director, Willie Ruth Daugherty**  
**380 Ripley Avenue**  
**Ashland, MS 38603**  
**(662) 224-8912 or 1-888-744-4407**

Benton	(662) 224-8912	Tippah	(662) 837-9812
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**WWISCAA**  
**Executive Director, Jannis Williams**  
**P.O. Box 1813**  
**1165 South Raceway Road**  
**Greenville, MS 38701**  
**(662) 378-8663 or 1-800-820-8204**

Issaquena	(662) 873-2595	Sharkey	(662) 873-2595
Warren	(601) 638-2474	Washington	(662) 378-8663
Yazoo	(662)746-1517		

# **APPENDIX E**

## **Tentative FY 2015 Allocations of Eligible Entities**

<b>2015 CSBG Tentative Allocations- June 2014</b>			
<b>(based on 2014 final allocations)</b>			
			Total
			Allocation
<b>AJFC</b>			
	Adams	1.44%	137,028
	Claiborne	0.62%	58,998
	Copiah	1.10%	104,674
	Franklin	0.32%	30,451
	Jefferson	0.45%	42,821
	Lawrence	0.43%	40,918
	Lincoln	1.14%	108,480
	Total	5.50%	523,369
<b>BOLIVAR</b>			
	Bolivar	2.25%	214,106
<b>CENTRAL MS</b>			
	Attala	0.75%	71,369
	Carroll	0.38%	36,160
	Grenada	0.89%	84,691
	Holmes	1.39%	132,270
	Leflore	2.33%	221,718
	Montgomery	0.50%	47,579
	Yalobusha	0.62%	58,998
	Total	6.86%	652,784
<b>COAHOMA</b>			
	Coahoma	1.60%	152,253

<b>2015 CSBG Tentative Allocations- June 2014</b>			
<b>(based on 2014 final allocations)</b>			
			Total
			Allocation
<b>GULF COAST</b>			
	George	0.44%	41,870
	Greene	0.34%	32,354
	Hancock	0.96%	91,352
	Harrison	4.31%	410,131
	Stone	0.40%	38,063
	Total	6.45%	613,769
<b>HINDS COUNTY</b>			
	Hinds	8.92%	848,810
<b>JACKSON COUNTY</b>			
	Jackson	3.20%	304,506
<b>LIFT</b>			
	Calhoun	0.51%	48,531
	Chickasaw	0.77%	73,272
	Itawamba	0.53%	50,434
	Lafayette	1.54%	146,543
	Lee	2.50%	237,895
	Monroe	1.25%	118,948
	Pontotoc	0.77%	73,272
	Union	0.79%	75,175
	Total	8.66%	824,069
<b>MID-STATE</b>			
	Desoto	2.30%	218,864
	Panola	1.65%	157,011
	Quitman	0.48%	45,676
	Tallahatchie	0.68%	64,707
	Tate	0.75%	71,369
	Tunica	0.50%	47,579
	Total	6.36%	605,205

<b>2015 CSBG Tentative Allocations- June 2014</b>			
<b>(based on 2014 final allocations)</b>			
			Total
			Allocation
<b>MULTI-COUNTY</b>			
	Clarke	0.62%	58,998
	Jasper	0.64%	60,901
	Kemper	0.37%	35,208
	Lauderdale	2.68%	255,024
	Newton	0.64%	60,901
	Wayne	0.79%	75,175
	EC- Neshoba	1.05%	99,916
	EC-Scott	1.17%	111,335
	EC-Smith	0.49%	46,627
	Total	8.45%	804,086
<b>NORTHEAST MS</b>			
	Alcorn	0.99%	94,206
	Marshall	1.29%	122,754
	Prentiss	0.89%	84,691
	Tishomingo	0.69%	65,659
	Total	3.86%	367,310
<b>PRVO</b>			
	Covington	0.86%	81,836
	Forrest	3.20%	304,506
	Jeff Davis	0.59%	56,143
	Jones	2.60%	247,411
	Lamar	1.07%	101,819
	Marion	1.06%	100,868
	Pearl River	1.95%	185,558
	Perry	0.44%	41,870
	Total	11.77%	1,120,010

<b>2015 CSBG Tentative Allocations- June 2014</b>			
<b>(based on 2014 final allocations)</b>			
			Total
			Allocation
<b>PRAIRIE OPPORTUNITY</b>			
	Choctaw	0.34%	32,354
	Clay	0.82%	78,030
	Lowndes	1.99%	189,365
	Noxubee	0.63%	59,950
	Oktibbeha	2.27%	216,009
	Webster	0.41%	39,015
	Winston	0.68%	64,707
	EC- Leake	0.71%	67,562
	Total	7.85%	746,991
<b>SOUTH CENTRAL CAA</b>			
	Simpson	1.06%	100,868
	Madison	2.03%	193,171
	Rankin	2.17%	206,493
	Total	5.26%	500,531
<b>SOUTHWEST MS</b>			
	Amite	0.59%	56,143
	Pike	1.75%	166,527
	Walthall	0.58%	55,192
	Wilkinson	0.45%	42,821
	Total	3.37%	320,683
<b>SUNFLOWER-HUMPHREYS</b>			
	Humphreys	0.64%	60,901
	Sunflower	1.52%	144,640
	Total	2.16%	205,541

<b>2015 CSBG Tentative Allocations- June 2014</b>			
<b>(based on 2014 final allocations)</b>			
			Total
			Allocation
<b>UNITED</b>			
	Benton	0.36%	34,257
	Tippah	0.83%	78,981
	Total	1.19%	113,238
<b>WWISCAA</b>			
	Issaquena	0.14%	13,322
	Sharkey	0.29%	27,596
	Warren	1.52%	144,640
	Washington	3.03%	288,329
	Yazoo	1.32%	125,609
	Total	6.30%	599,496

# **APPENDIX F**

## **Map of Areas Served**



# **APPENDIX G**

## **FY 2014 CSNA Results**

## **Community Strength and Needs Assessment Statewide Results**

The Mississippi Department of Human Services (MDHS) Division of Community Services (DCS) is dedicated to helping low-income individuals meet various needs. The MDHS DCS secured a Community Strengths and Needs Assessment (CSNA) from each eligible entity within the State. The CSNAs are the basis for the ranking of services stated in the Community Action Agency/Human Resource Agency's community action plan and their budget request. The CSNA was conducted in each county served. Participation from citizens in all aspects of the community, public, private, and the poor sector were asked to complete a survey. The CSNA was also shared with partners, other entities and other programs administered by the agencies. Some of the methods used to conduct the CSNAs were: mail survey, personal interviews and community meetings.

The needs assessment asks individuals general information such as:

- gender,
- race
- educational level
- major source of income
- family size
- number of children under the age 5 in the household
- number of disabled children in household
- number of elderly in the household age 60 and over

Participants completing the needs assessment were asked to rank in order from one to nine with one being the most important; the services they felt were most needed in their area. Those services included: employment, education, emergency, health and safety, nutrition, housing, child care, transportation and income management.

Once the agencies submitted their FY 2014 subgrants to the MDHS-DCS, the results from each CAA/HRA were compiled and reviewed. The top three rankings for the State of Mississippi indicated that employment was the greatest need, Education and Housing tied for second and transportation was the third. During the Annual DCS Implementation workshop, a session was held to address the results of the CSNAs. CAAs/HRAs were encouraged to coordinate services and to establish partnerships to assist clients with finding sustainable employment, helping them obtain a GED or continuing their education by getting a degree or trade, assisting the client in obtaining decent and affordable housing, and lastly helping clients secure reliable transportation.

We have and will continually work with our agencies to eliminate barriers so that the client can become self-sufficient. We strongly encourage partnerships to assist in helping those clients within the State of Mississippi.

# **APPENDIX H**

## **Legislative Public Hearing**

LEGAL GRANTS  
(Block Grants)  
MISSISSIPPI DEPARTMENT OF  
HUMAN SERVICES  
Division of Community Services  
Legislative Public Hearing

The Mississippi Department of Human Services, Division of Community Services will be conducting the Legislative Public Hearing on the Community Services Block Grant and Low-Income Home Energy Assistance Programs under Title 26 of the Omnibus Budget Reconciliation Act of 1981, as amended. The hearing for the 2015 programs is scheduled for Tuesday, June 10, 2014, at 10:00 a.m. at the Mississippi State Capitol, 400 High Street, Room 113, Jackson, Mississippi.

The Community Services Block Grant provides funds for a range of activities to ameliorate the causes and effects of poverty. For Fiscal Year 2015, at least 90 percent of the funds allocated to the State through these grants will be contracted to non-profit community action agencies, migrant seasonal farm worker organizations or community-based organizations that meet the eligibility requirements as described in Section 675 of the Community Services Block Grant Act, as amended. The eligibility requirements for the program are outlined in the application process.

The Low-Income Home Energy Assistance Program assists eligible households to pay the costs of home energy bills and other energy-related services, for example, wood, kerosene, electricity, gas, heaters, blankets, fans and air conditioners. For Fiscal Year 2015, at least 90 percent of the funds allocated to the State through these grants will be contracted to private, nonprofit, and public agencies designated in accordance with Public Law 97-35, as amended. The eligibility requirements for the program are outlined in the application process.

Copies of the state plans are available for review at the Mississippi Department of Human Services by calling 601-359-4768 or 1-800-421-0762.

Inquiries, comments or suggestions regarding the block grant plan and/or eligibility requirements must be received on or before June 13, 2014 by the Division of Community Services, P. O. Box 352, Jackson, Mississippi 39205. Public comments will be reviewed before finalizing the 2015 State Plans for these programs.

**MISSISSIPPI DEPARTMENT OF HUMAN SERVICES  
DIVISION OF COMMUNITY SERVICES**

**MEMORANDUM**

TO: Denise Williams  
Department of Purchasing

FROM: Nicole McBeath  
Division of Community Services

DATE: April 25, 2014

SUBJECT: Publication of Legal Notice

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The Division of Community Services requests that a legal notice concerning the Legislative Public Hearing on the Community Services Block Grant and Low-Income Home Energy Assistance Programs be published in the classified section of the twelve newspapers listed (See attachment). The information should be advertised on May 27, 2014 and June 3, 2014 and should appear one time in each newspaper. Please send us the copies of the newspaper advertisements from **three** different publishers as soon as they are announced.

Should you have any questions, please contact Nicole McBeath at 9-4765.

TMR:nm

Attachments

Mississippi Department of Human Services  
Division of Community Services

**NEWSPAPERS**

1. **The Jackson Advocate**  
115 East Hamilton  
Jackson, MS 39202
2. **The Natchez Democrat**  
Post Office Box 1447  
Natchez, MS 39121-39221
3. **The Commercial Dispatch**  
Post Office Box 511  
Columbus, MS 39703
4. **The Delta Democrat Times**  
Post Office Box 1618  
Greenville, MS 38701
5. **The Daily Corinthian**  
Post Office Box 119  
Corinth, MS 38834
6. **The Gulf Publishing Company**  
Post Office Box 4567  
Biloxi, MS 39535
7. **The Clarion Ledger**  
Post Office Box 40  
Jackson, MS 39205-0040
8. **The Vicksburg Evening Post**  
Post Office Box 951  
Vicksburg, MS 39180
9. **The Northeast MS Daily Journal**  
Post Office Box 909  
Tupelo, MS 38801
10. **The Hattiesburg American**  
Post Office Box 1111  
Hattiesburg, MS 39401
11. **The Clarksdale Press Registrar**  
Post Office Box 1119  
Clarksdale, MS 38614
12. **The Meridian Star**  
Post Office Box 1591  
Meridian, MS 39301

**MISSISSIPPI DEPARTMENT OF HUMAN SERVICES  
DIVISION OF COMMUNITY SERVICES**

**AGENDA**

**2015 COMMUNITY SERVICES BLOCK GRANT (CSBG)  
AND  
2015 LOW-INCOME HOME ENERGY ASSISTANCE PROGRAM (LIHEAP)**

**LEGISLATIVE PUBLIC HEARING**

**Tuesday, June 10, 2014, at 10:00 a.m.**

**MISSISSIPPI STATE CAPITOL  
400 HIGH STREET  
ROOM 113,  
JACKSON, MISSISSIPPI**

- I. Opening Remarks and Introduction
- II. Purpose of Hearing
- III. Presentation of FY 2015 State Plan
  - LIHEAP
  - CSBG
- IV. Public Comments
- V. Closing Remarks

## PUBLIC COMMENTS FROM THE 2015 LEGISLATIVE PUBLIC HEARING

### Multi-County Community Service Agency

Will the new Mississippi Accountability System for Government Information and Collaboration (MAGIC) allow attachments to be uploaded?

### AJFC Community Action Agency

What is the set date MAGIC will affect the agencies?

### Hinds County Human Resource Agency

- I. In section I. CSBG State Plan Narrative, Part B. Criteria and Formula for the Distribution of CSBG Funds (*Page 14*), It states: The State will contract with eligible entities during Program Year 2015, beginning January 1, 2015 through December 31, 2015. Funds are obligated effective January 1 in accordance with MDHS Sub grantee Manual.

Allocable FFY 2015 Mississippi CSBG funds will be distributed on a formula basis, based on the percentage (latest Census data) of the poor population in a county compared to the statewide percentage (pending Federal allocation to the State of Mississippi). The CSBG sub grant allocations will use the following factors:

4. Twenty-five (25) percent of each eligible entities allocation must be allocated to the Supportive Services activity for direct client services.
5. Fifteen (15) percent of each eligible entities allocation may be used for the Administrative activity.
6. Sixty (60) percent of each eligible entities allocation may be used for the Case Management activity.

*It is not understood why this section is needed and how is it valid under the CSBG Act. This takes away the creative ability of agencies if we are forcing them to use a certain percentage to “supportive services” and “case management”. Since 2001 – Information Memorandum (IM) 49 is the public policy document that sets ROMA within the context of compliance under GPRA, and provides guidance for both state CSBG agencies and the CAAs for managing client activities and reporting results. The framework for achieving outcomes includes a full range management and accountability activities as depicted by the ROMA Cycle. If CSBG agencies are to form results oriented plans based on their comprehensive community needs assessment, they should reserve the right to conduct activities that may be at the family, community or agency level and not specifically required to perform only family level services. If any CSBG entity chooses to use all*

*partnerships and sub grant all of its CSBG funding to community development and they have the needs assessment research to back up this board decision, then they reserve that right under the CSBG Act and subsequent Information Memorandums.*

- II. In section I. CSBG State Plan Narrative, Part D, Description of Distribution and Use of Discretionary Funds - 676(b) (2), It states: MDHS-DCS will allocate at least 5 percent of CSBG funds received by the State for FFY 2015 to support discretionary projects related to the purposes of the CSBG Act and the six national goals.

A percentage of discretionary funds are allocated based on the following activities:

4. Capacity building- 57%: to include T&TA, IT needs for the Virtual ROMA system, staff training and ACH;
5. Corrective Action- 8%: to include partnerships with the state CAA association to assist CAAs with corrective action strategies and;
6. Other CSBG purposes- 35%: to include new and existing community projects for seniors and youth.

*Section 1 equals to \$286, 636.47 for services that have not been an impact as much as the ability to create new projects. Does this cover a separate T&TA staff salary outside of the Administration 5% and an IT contract for Virtual ROMA? Section 3 is \$176,004.85 and there are not any measureable criteria for "other CSBG purposes."*

- III. In section I. CSBG State Plan Narrative, Part F. State Community Services Program Implementation - 676(b) (3) Section 2 .Community Strength and Needs Assessments

In accordance with the assurance in 676(b)(11) of the Act, MDHS-DCS will secure from each eligible entity in the State, as part of its annual application and as a condition of a financial award, a community action plan which will provide a description of the Community Strengths and Needs Assessment (CSNA) for the community served. The CSNA must be conducted in each county served including citizens from all aspects of the community, public, private, and the poor sector. The CSNA may also include partners, other entities and other programs administered by the entity. The CSNAs are the basis for the ranking of services stated in the community action plan and the budget request.

The community action plan must provide a description of the following:

- j) A description of the comprehensive CSNA to determine the services to be provided based on eligible activities;
- k) A description of outcome measures to be used to monitor success in promoting self-reliance, family stability, and community revitalization.
- l) The entity must state goals and objectives in measurable terms and projected in a quarterly timetable, which indicates when the stated goals and objectives

will be accomplished. The strategies employed to achieve the objectives must be adequately described and quantified. This information will also be used in conjunction with Virtual ROMA the Management Information System to measure plan-versus-actual performance levels.

*When stating objectives, does the state plan imply outcomes? Can Virtual ROMA complete the measure of section iii?*

- IV. Under Part 4. Earned Income Tax Credit (EITC) Project, it states: All eligible entities must provide a plan for EITC and describe how it will be incorporated into case management for clients. What if a needs assessment and agency plan doesn't call for the agency to provide EITC or case management? This is a large assumption that an agency should automatically keep the service format set forth by the state.
- V. Under the Federal Assurance 676(b)(4), it states: 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 plane suggest: COMPLIANCE: MDHS-DCS will carry out this Assurance by assisting eligible entities in evaluating emergency and non-emergency nutritional needs. Such assistance will be provided through review of entity applications and community action plans as well as through regular sharing of community-based or statewide information as it is known.*

The entities will be required to coordinate with local soup kitchens, food banks and also the area of direct assistance that will allow purchases of hard-to-secure supplies, nutritious foods and related services. The entities are also required to provide a copy of their emergency service plan to meet the needs of their clients.

The entities are required to partner with their local DHS Economic Assistance offices to refer client for expedited services in emergency situations. If SNAP benefits cannot be provided that same day, entities must provide assistance by giving food vouchers for emergency nutritional needs.

*This specifically stating that we give food vouchers and "required to coordinate to work with local soup kitchens" is not what this federal assurance requires.*

- VI. In regards to Organizational Standards. The state plan suggests; Effective FFY 2015 MDHS-DCS will implement organizational standards in eligible entities sub grants. It is the goal of the state and eligible entities to meet 75% of the organizational performance standards in FFY 2015 and meet 75% of the standards for FFY 2015 and 100% for FFY 2016. The state will provide necessary T&TA to eligible entities to meet standards. Also,

the state will seek and participate in Federal Training and training provided by outside consultants to meet the organizational standards.

*HCHRA suggest that 100% of anything is setting unrealistic standards rather there should be a scale set to allow for fluid change that occurs through development.*

- VII. *Appendix J: CSBG Outcome Indicators pages 91-9. These need to be corrected to include logic model development and not included in the state plan. They should use correct ROMA practices by establishing documentation of movement from one outcome on a scale to another as opposed to just placement on scale.*

# **APPENDIX I**

## **Fair Hearing Process**

**FAIR HEARING PROCESS  
CLIENT LEVEL**

**Client Rights**

A client must be apprised of his/her right to a fair hearing at the time the application is made. Each entity has established a set of procedures which explicitly detail the proper local channels, with the appropriate time frames a client should follow, in his/her request for a fair hearing.

All appeals must be routed through the Division of Community Services.

**Step I**

After having exhausted all channels of resolution at the local level, the complainant has five (5) working days to submit an appeal to:

Director  
Division of Community Services  
Mississippi Department of Human Services  
Post Office Box 352  
Jackson, Mississippi 39205

This appeal must include, but not limited to, the following:

1. Name and address of complainant.
2. Name of entity in dispute.
3. Date of denial notification.
4. Reason for denial.
5. Justification noting why service(s) should be rendered.
6. Two (2) signed and dated copies of the appeal (an original and one copy).

The Director of the Division of Community Services shall have a period of ten (10) working days to research the matter, conduct a hearing, and render a written decision. If this decision is not satisfactory, the complainant may proceed with Step II.

**Step II**

The complainant shall have five (5) working days after receiving a decision in Step I to file an appeal with:

Executive Director  
Mississippi Department of Human Services  
Post Office Box 352  
Jackson, Mississippi 39205

The procedures for filing such a complaint are the same as those listed in numbers 1-6 of Step I. The Executive Director of the Mississippi Department of Human Services shall have fifteen (15) working days to research the matter, conduct a hearing, and render a decision. Should the complainant deem this decision to be unsatisfactory, he/she may proceed to Step III.

### **Step III**

If the complainant is dissatisfied with the decision rendered by the Executive Director of the Mississippi Department of Human Services, the complainant shall have five (5) working days after receiving a written decision in Step II to file a complaint with the Secretary of the U.S. Department of Health and Human Services. The procedures for filing such a complaint are the same as those listed in Steps I and II. The complaint shall be filed with:

Secretary  
U.S. Department of Health and Human Services  
Office of Community Services  
370 L'Enfant Promenade, S.W., 5<sup>th</sup> Floor  
Washington, DC 20447

At this point the time frame for a response shall be determined solely by the Secretary of the U.S. Department of Health and Human Services. The Secretary's decision is final and binding.

**FAIR HEARING PROCESS  
ENTITY LEVEL**

**TERMINATION AND/OR SUSPENSION OF COMMUNITY ACTION ENTITIES**

The State shall notify, in writing, any community action entity which received funding under the Community Services Block Grant that a hearing on the proposed termination or suspension of such a community action entity, as result of alleged subgrant violation(s), State and/or Federal non-compliance, will be held. The procedures for such hearing are stated below.

A. Hearing notices will be directed from:

Executive Director  
Mississippi Department of Human Services  
Post Office Box 352  
Jackson, Mississippi 39205

B. The notice will include, but not limited to, the following:

1. Name and address of the community action entity whose grant is to be terminated or suspended.
2. Date and location of hearing.
3. Reason(s) for hearing, that is, the alleged violations which are to result in termination or suspension.

C. The Executive Director shall have a period of ten (10) working days after the hearing to render a decision, notify the entity, and forwarded all evidence and its conclusion to the Secretary of the U.S. Department of Health and Human Services for final review and determination.

**NOTE:** This procedure does not preclude or otherwise limit an eligible entity from seeking review and/or other remedy through the courts.

# **APPENDIX J**

## **ADDITIONAL DCS POLICIES**

## **I. Criminal/Illegal Activities**

Federal dollars will not be utilized to pay for any criminal acts that may be punishable with fines, fees and other penalties and/or imprisonment.

- A. Any applicant submitting invoices for payment which explicitly state that part of the bill is inclusive of any illegal activity such as tampering and other theft for services will not be an allowable expense and therefore CSBG/LIHEAP funds cannot be utilized to pay such expenses.
- B. The vendor can adjust the bill to reflect the amount less the fees and the Subgrantee can pay the portion that does not include such fees and penalties. Further, fees and penalties must be paid prior to any CSBG/LIHEAP funds being obligated on behalf of the clients' bill.
- C. Any applicant obtaining services under fraudulent circumstances will be disqualified from receiving services for 6 months from the date of the application.

## **II. Threats**

- A. Any applicant who makes a verbal or physical threat against a subgrantee agency, any subgrantee staff, subgrantee contractor, or state/federal staff will be prohibited from receiving services for 1 year from the date of application, for the first offense.
  - 1. When a threat is made against subgrantee staff, that staff person must complete an incident report and submit it to the subgrantee's Executive Director.
  - 2. Executive Director must contact local authorities and file a report. A copy of the police report and detailed account of the incident must be kept in the client's file.

Any subsequent threats will disqualify the client from receiving services permanently.

## **III. Reconnect/Late Fees**

- A. Reconnect/Late fees resulting from a client losing service due to the inability to pay can be paid upon approval by the supervisor. The agency should be careful not to expend a large percentage of funds paying reconnect fees. During Orientation and other informative sessions, Subgrantees should communicate to the clients the necessity of making timely payments or making arrangements with the vendor in order to avoid such fees.
- B. Paying reconnect/late fees on behalf of clients due to negligence of the Subgrantees to make timely payment(s) will not be eligible for utilizing CSBG/LIHEAP funds.

#### **IV. Deposits**

Deposits can be paid once using CSBG/LIHEAP funds except in emergency or life-threatening situations with a lifetime limit of two deposits.

#### **V. Eligibility**

- A. Applicant must be a resident of the State of Mississippi and must reside in the county of the subgrantee from which assistance is requested. Subgrantee must require that any bills being presented for payment is in the name of a living head of household and/or spouse and include the applicant's address. If a bill is in the name of an incarcerated or deceased spouse, the caseworker, when feasible, shall assist the applicant with the name change; however, the agency may still pay the bill. If the bill is in the name of an estranged or divorced spouse, the agency may assist the client during the initial appointment; however, the bill must be in the head of household's name for all subsequent services. If the bill is in the landlord's name, a form of authorization is needed to verify the tenant's living status. The landlord cannot request services on behalf of tenant/client.
- B. A household with an address that straddles county lines must provide proof of Homestead Exemption. A determination of where the taxes are paid is the key in determining which subgrantee and/or caseworker can process the client application. To determine the county for a client who is not eligible for Homestead, other alternatives such as Voter Registration I.D. or the county in which the household receives any other social or human services can be used.
- C. Applicants must be eighteen (18) years of age or older or an emancipated minor and must be head of household. Emancipated minors for the purpose of receiving federal assistance from DCS funded programs are those who have received emancipation initiated by court action through the State of Mississippi's social service procedures. Necessary information needed to determine eligibility is as follows but not limited to:
  - 1. Photo I.D. for all household members eighteen (18) or older.
  - 2. Social Security cards for all household members.
  - 3. Copy of certified Birth Certificates for all household members.
  - 4. Proof of household Gross Income.

#### **VI. Related and/or personal interest cases**

- A. Any employee and relatives and/or personal interest cases of employees may apply for and receive assistance; however, there are special procedures for taking and processing these applications. An employee cannot complete the client intake or be involved in the

approval process of a relative. In this occurrence, the caseworker should immediately recuse oneself from any involvement with the case.

- B. The Program Director is responsible for taking and processing applications for employees, relatives of employees or personal interest cases and for submitting the case to the Executive Director for review and authorization of the approval or denial. Applications for assistance from Program Directors or their relatives will be taken and processed by the Executive Director.
- C. The relatives for whom the special procedures must be used include: employee's spouse/ex-spouse, grandparents (also great and great-great grandparents), parents, (including stepparents), brothers and sisters (including stepbrothers and stepsisters, half-brothers and half-sisters), children (including stepchildren), grandchildren (also great and great-great grandchildren), aunts, uncles, nieces, nephews, first & second cousins, and these relatives of an employee's spouse who are related to this degree of marriage.
- D. Furthermore, no preferential treatment will be granted to an employee and his or her relatives and/or personal interest cases. The same process for requesting and receiving assistance that applies for the general public, applies in this case also.

## **VII. Immigration Status**

- A. If the Head of Household is an illegal alien, the application should be denied for the entire household.
- B. If an individual within a household is an illegal alien, does not disclose citizenship or establish satisfactory immigration status, ineligibility exists only for the individual member and not the entire household. The remaining household members should have eligibility determined. During the application process, any individuals within the household who do not wish to comply with citizenship and alien status requirements are considered "Non-Applicants" and should not be questioned about citizenship/alien status. However, these individuals must disclose and verify income and other information needed to establish the eligibility of the household. Eligibility cannot be determined when a Non-Applicant fails to disclose income, therefore, the application should be denied for the entire household. If adequate documentation of immigration status is subsequently provided for the Non-Applicant, the worker shall act upon the reported change in accordance with appropriate timeliness standards.

Most aliens who have entered the United States legally have in their possession documents that were issued by the United States Citizenship and Immigration Services (USCIS) which contains the person's immigration status and the date that person entered the country, or adjusted to the status shown on the card. It is the responsibility of the applicant to provide the USCIS documents prior to eligibility determination. If

the applicant does not provide documents establishing alien status on a timely basis or if alien status is questionable, the eligibility of the remaining household members shall be determined.

The most common documents used to verify alien status include, but are not limited to:

1. Form I-551- Resident Alien Card and Conditional Resident Alien Card
  2. Form I-151- Alien Registration Receipt Card
  3. Form I-94- Arrival-Departure Record (Annotated with Section 207 or refugee, asylum, or paroled)
  4. Form I-688- Temporary Resident Card
  5. Unexpired foreign passport when it contains an endorsement "Processed for I-551. Temporary Evidence of Lawful Admission for Permanent Residence"
- C. When a household or person indicates inability or unwillingness to provide documentation of alien status for any household member, that (non-applicant) member should be classified as "Ineligible", not illegal. Workers are cautioned that a determination that a person is Ineligible is not equivalent to a determination that a person is an illegal alien.

A person will be reported to the appropriate USCIS office under the following circumstances:

1. The applicant, another household member or the authorized representative admits that illegal aliens are present in the household;
2. USCIS documents presented by the household during the application process are determined to be forged;
3. A formal order of deportation or removal is presented by the household during the application process.

## **VIII. Public Assistance**

- A. Changes in the CSBG Act require that CSBG clients be referred to the child support office if they are entitled to those support benefits. Clients who fail to comply with child support, TANF or any other form of public assistance requirements can be denied monetary assistance. Agencies should establish working relationships and coordination procedures with local service providers. The question of assistance should be considered when looking at a client's income. Clients who are non-compliant with these procedures will not be allowed to receive monetary assistance or referral services until sanction has been removed.

- B. Sanctions that occurred as a result of child support or any illegal acts involving the use of DCS funded programs will result in sanction from receiving any DCS funding, except that the sanction has been removed or an agreement made with the sanctioning agency. If the household consists of a vulnerable adult/child, DCS funding may be utilized with the approval of supervisory staff.

**IX. Convicted Individuals**

Individuals with non-controlled substance convictions who have successfully served their time must comply with all the conditions of their release and provide evidence they are in compliance. If those conditions apply, they are eligible for assistance for DCS administered funds.

# **APPENDIX K**

## **ROMA ENTITY DEVELOPMENT GOALS**

### **CSBG OUTCOME INDICATOR MEASUREMENT GOALS**

# ROMA ENTITY DEVELOPMENT GOAL 1

## GOVERNANCE

Please identify using the following matrix levels the current status of each goal within your entity and your projected status for this program year. Please attach a brief description of the actions to be taken to achieve desired goals.

Current Status	Projected Status for Program Year	MATRIX LEVEL	MATRIX CRITERIA
		GOVERNANCE THRIVING	<ol style="list-style-type: none"> <li>1. Board in full compliance with laws governing composition;</li> <li>2. Board and/or committees meet on regularly scheduled basis, with full attendance 50% of time;</li> <li>3. Board actively works to design functional action plans to ensure staff and entity growth and development;</li> <li>4. Vision/mission statements reviewed annually and updated as needed in line with entity/community needs; long range plans in effect; board monitors/evaluates program operations for compliance;</li> <li>5. Engages in on-going training on role and responsibilities;</li> <li>6. Members enthusiastic about their role and mission of entity; works to strengthen entity in community.</li> </ol>
		GOVERNANCE SAFE/SELF-SUFFICIENT	<ol style="list-style-type: none"> <li>1. Board and/or committee meet on scheduled basis, with quorum in attendance 75% of time;</li> <li>2. Action plans are followed to ensure entity/staff remain current in fiscal year; short range plans in effect;</li> <li>3. Vision/mission reviewed annually; timely monitors/evaluates programs for compliance;</li> <li>4. Board training is done at least bi-annually;</li> <li>5. Board members cognizant of their role and act accordingly; support is shown to strengthen entity role in community.</li> </ol>
		GOVERNANCE AT-RISK	<ol style="list-style-type: none"> <li>1. No regularly scheduled committee meetings; lacks quorum at over 30% of board meetings;</li> <li>2. Vision mission is unclear and unfocused; little monitoring/evaluation for program is done;</li> <li>3. Board has no training schedule; most unsure of role;</li> <li>4. No board action to support community awareness of entity.</li> </ol>
		GOVERNANCE IN CRISIS	<ol style="list-style-type: none"> <li>1. Board structure not in compliance with law or one-third requirement;</li> <li>2. Board and/or committee meet irregularly or not at all;</li> <li>3. No mission or vision established for entity;</li> <li>4. No board training offered; no support for entity activities; no community awareness activities take place.</li> </ol>

## ROMA ENTITY DEVELOPMENT GOAL 2

### MISSION INTEGRATION

Please identify using the following matrix levels the current status of each goal within your entity and your projected status for this program year. Please attach a brief description of the actions to be taken to achieve desired goals.

Current Status	Projected Status for Program Year	MATRIX LEVEL	MATRIX CRITERIA
		MISSION INTEGRATION THRIVING	<ol style="list-style-type: none"> <li>1. Vision and mission clear and are the focus of entity programs;</li> <li>2. Board and staff involved in on-going training and kept informed on all issues that impact entity; program are changed as necessary to ensure they meet objectives;</li> <li>3. Entity is strong and viable in community; set objectives are exceeded; constantly work to improve service results.</li> </ol>
		MISSION INTEGRATION SAFE/SELF-SUFFICIENT	<ol style="list-style-type: none"> <li>1. Vision and mission clear and are the focus of entity programs; reviewed annually to ensure community's needs are met;</li> <li>2. Board and staff involved in set training and informed on issues that impact entity; programs are changed annually to meet set objectives;</li> <li>3. Entity is well-known in community; programs in place to provide services according to vision/mission; 90% of program objectives are met.</li> </ol>
		MISSION INTEGRATION STABLE	<ol style="list-style-type: none"> <li>1. Vision/mission has been defined and service plans are being developed;</li> <li>2. Board/staff involved in periodic training and informed on issues that impact entity; programs are reviewed and evaluated annually to meet objectives;</li> <li>3. Community is aware of entity; 70% of program objectives are met.</li> </ol>
		MISSION INTEGRATION AT-RISK	<ol style="list-style-type: none"> <li>1. Vision/mission is fragmented and not in line with entity purpose;</li> <li>2. Board/staff involved in some training; programs are reviewed/evaluated periodically;</li> <li>3. Entity program are stretching staff capacity to function;</li> <li>4. Community is aware of entity; some efforts are made to address concerns in community;</li> <li>5. Community is not fully aware of entity; very little efforts are made to address concerns in community.</li> </ol>

## ROMA ENTITY DEVELOPMENT GOAL 3

### ADMINISTRATION AND FISCAL HEALTH

Please identify using the following matrix levels the current status of each goal within your entity and your projected status for this program year. Please attach a brief description of the actions to be taken to achieve desired goals.

Current Status	PROJECTED STATUS FOR PROGRAM YEAR	MATRIX LEVEL	MATRIX CRITERIA
		ADMIN. & FISCAL HEALTH THRIVING	<ol style="list-style-type: none"> <li>1. Entity has sufficient funds, both federal and private to support all existing entity operations;</li> <li>2. Entity has adequate resources to support operations in face of cuts or elimination of one or more federal programs;</li> <li>3. Entity has good public relation programs in place which results in wide spread community support;</li> <li>4. Sound leadership and governance.</li> </ol>
		ADMIN. & FISCAL HEALTH SAFE/SELF-SUFFICIENT	<ol style="list-style-type: none"> <li>1. Entity has two or more income producing projects/collaborations that will lessen dependence on federal funds;</li> <li>2. Entity leadership and governance is sound;</li> <li>3. Entity working towards administrative and fiscal improvements.</li> </ol>
		ADMIN & FISCAL HEALTH STABLE	<ol style="list-style-type: none"> <li>1. Entity budget is 100% outlined, with comparative data on existing and needed resources for implementation;</li> <li>2. Working partnerships in place to promote entity growth;</li> <li>3. Entity is fiscally accountable with no serious monitoring or audit findings;</li> <li>4. Entity vision and mission is clear; board and staff geared towards mission accomplishments.</li> </ol>
		ADMIN. & FISCAL HEALTH AT-RISK	<ol style="list-style-type: none"> <li>1. Entity has little or no community support;</li> <li>2. Loss of any federal funds result in suspension or termination of services or reduction of staff;</li> <li>3. Outside intervention may be needed to prevent serious accounting problems;</li> <li>4. One or more serious audit findings.</li> </ol>
		ADMIN. & FISCAL HEALTH IN-CRISIS	<ol style="list-style-type: none"> <li>1. Entity leadership and governance is at odds;</li> <li>2. Ability of administrative staff is insufficient to carry out direction of board;</li> <li>3. Entity funding terminated due to non-compliance with procedures, regulations or ordinances;</li> <li>4. Entity has problem with one or more funding sources;</li> <li>5. Outside intervention is needed to prevent entity failure;</li> <li>6. Entity is dependent on federal funding for over 100% of program operations;</li> <li>7. Outside intervention is required to prevent entity failure.</li> </ol>

## ROMA ENTITY DEVELOPMENT GOAL 4

### PLANNING AND EVALUATION

Please identify using the following matrix levels the current status of each goal within your entity and your projected status for this program year. Please attach a brief description of the actions to be taken to achieve desired goals.

Current Status	PROJECTED STATUS FOR PROGRAM YEAR	MATRIX LEVEL	MATRIX CRITERIA
		PLANNING AND EVALUATION THRIVING	<ol style="list-style-type: none"> <li>1. Staff and board equally involved in planning/evaluation of all entity programs; programs mission driven;</li> <li>2. Program goals and objectives are realistic in terms of entity/staff capacity and ability;</li> <li>3. Programs meet all conditions for funding and are funded over 95% of times;</li> <li>4. Programs rated as outstanding by outside source; often used as model programs.</li> </ol>
		PLANNING AND EVALUATION SAFE/SELF-SUFFICIENT	<ol style="list-style-type: none"> <li>1. Schedule for internal evaluation maintained and carried out on acceptable basis;</li> <li>2. Community involvement requested and uses in formation of plans;</li> <li>3. Programs meet all conditions for funding and are funded 90% of time;</li> <li>4. Orientation/training for programs provided to board/staff;</li> <li>5. Programs rated excellent by outside source;</li> <li>6. Constantly seeking new funding sources based on community needs.</li> </ol>
		PLANNING AND EVALUATION STABLE	<ol style="list-style-type: none"> <li>1. Internal evaluation schedule is in place, but not properly followed;</li> <li>2. Programs loosely based on actual community needs assessment; assessment not fully complete;</li> <li>3. Program barely meet conditions of current funding sources;</li> <li>4. Staff and board partially involved in planning and evaluation of programs;</li> <li>5. Training is erratic; no technical assistance given;</li> <li>6. Programs rated satisfactory by outside source;</li> <li>7. Periodic training and technical assistance given.</li> </ol>
		PLANNING AND EVALUATION AT-RISK	<ol style="list-style-type: none"> <li>1. Board fails to approve program applications;</li> <li>2. Plans are not tied to community needs;</li> <li>3. No efforts are made to improve program design;</li> <li>4. Community unaware of programs or their purpose;</li> <li>5. Community not involved in planning.</li> </ol>
		PLANNING AND EVALUATION IN-CRISIS	<ol style="list-style-type: none"> <li>1. Board not involved in entity planning, possesses limited knowledge of entity programs and services;</li> <li>2. Programs rarely, if ever, funded; never seeks new programs;</li> <li>3. Plan, when made, not tied to community needs;</li> <li>4. Program ineffective in solving problems for which designed to meet;</li> <li>5. Board and staff not open to new ideas; unwilling to change.</li> </ol>

## ROMA ENTITY DEVELOPMENT GOAL 5

### FUND DEVELOPMENT

Please identify using the following matrix levels the current status of each goal within your entity and your projected status for this program year. Please attach a brief description of the actions to be taken to achieve desired goals.

Current Status	PROJECTED STATUS FOR PROGRAM YEAR	MATRIX LEVEL	MATRIX CRITERIA
		FUND DEVELOPMENT THRIVING	<ol style="list-style-type: none"> <li>1. Constant search for innovative funding sources;</li> <li>2. Fund development include efforts to increase non-federal base;</li> <li>3. Community has bought into entity funding needs, and support is high level;</li> <li>4. Fund development committee functioning on regular basis;</li> <li>5. Board place fund development high on list of entity priorities;</li> <li>6. 5% annual increases of funding base.</li> </ol>
		FUND DEVELOPMENT SAFE/SELF-SUFFICIENT	<ol style="list-style-type: none"> <li>1. Board is actively involved in fund development;</li> <li>2. Set goals for development in line with entity needs;</li> <li>3. Projects future needs and plans accordingly;</li> <li>4. Has increased local support by at least 1% over previous year.</li> </ol>
		FUND DEVELOPMENT STABLE	<ol style="list-style-type: none"> <li>1. Board annually reviews entity funding needs;</li> <li>2. Safe priority for existing funds and goals for additional needs;</li> <li>3. Entity plans including goals to decrease dependence on federal funds;</li> <li>4. Entity has good local financial support.</li> </ol>
		FUND DEVELOPMENT AT-RISK	<ol style="list-style-type: none"> <li>1. Dependence on federal funds is extremely high;</li> <li>2. Board has no viable plan for increasing funding base;</li> <li>3. Sees no need to reduce federal level;</li> <li>4. Local support is limited.</li> </ol>
		FUND DEVELOPMENT IN-CRISIS	<ol style="list-style-type: none"> <li>1. No plan for fund development;</li> <li>2. Fund development is limited to crisis intervention management;</li> <li>3. No local financial support of entity;</li> <li>4. Fund development is not goal or high priority of entity;</li> <li>5. Totally dependent on federal funds;</li> <li>6. Sees no need to reduce dependency on federal funds.</li> </ol>

## ROMA ENTITY DEVELOPMENT GOAL 6

### COLLABORATION AND PARTNERSHIP

Please identify using the following matrix levels the current status of each goal within your entity and your projected status for this program year. Please attach a brief description of the actions to be taken to achieve desired goals.

Current Status	PROJECTED STATUS FOR PROGRAM YEAR	MATRIX LEVEL	MATRIX CRITERIA
		COLLAB. & PARTNERSHP THRIVING	<ol style="list-style-type: none"> <li>1. Working collaboration/partnership with most all facets of community to fill service gaps;</li> <li>2. Establish new partnerships – ten or more each year;</li> <li>3. Entity is consistently approached by outside sources to form working partnerships;</li> <li>4. Collaborations and partnerships substantially (5% or more) increasing financial base;</li> <li>5. Established continuum of care for community in place.</li> </ol>
		COLLAB. & PARTNERSHP SAFE/SELF-SUFFICIENT	<ol style="list-style-type: none"> <li>1. Establishing five to ten new partnerships each year;</li> <li>2. Community support of entity ventures extremely high;</li> <li>3. Existing partnerships generating resources for entity;</li> <li>4. Collaboration/partnership has potential of decreasing dependence on federal funds;</li> <li>5. Actively working to establish a continuum of care.</li> </ol>
		COLLAB. & PARTNERSHP STABLE	<ol style="list-style-type: none"> <li>1. Has at least five working partnerships within community;</li> <li>2. Support for entity programs above average;</li> <li>3. Foundation is established to create continuum of care for community;</li> <li>4. Local public/private support increased by at least 1% over previous year.</li> </ol>
		COLLAB. & PARTNERSHP AT-RISK	<ol style="list-style-type: none"> <li>1. Establishing partnerships/collaborative agreements are not part of entity plans;</li> <li>2. Community offers very limited support of entity/programs; has vague idea about entity purpose;</li> <li>3. Entity has two or three existing partnerships in the community;</li> <li>4. Very minimal public/private financial support.</li> </ol>
		COLLAB. & PARTNERSHP IN-CRISIS	<ol style="list-style-type: none"> <li>1. No plan or desire to establish partnerships with community;</li> <li>2. Community offers no support for entity/programs; has no idea about entity purpose;</li> <li>3. Entity has no existing partnership in community and/or partnerships has produced no viable resources for entity;</li> <li>4. Totally dependent on federal funds.</li> </ol>

## ROMA ENTITY DEVELOPMENT GOAL 7

### CULTURAL SENSITIVITY AND COMPETENCE

Please identify using the following matrix levels the current status of each goal within your entity and your projected status for this program year. Please attach a brief description of the actions to be taken to achieve desired goals.

Current Status	PROJECTED STATUS FOR PROGRAM YEAR	MATRIX LEVEL	MATRIX CRITERIA
		CUL. SENSITIVITY & COMPETENCE THRIVING	<ol style="list-style-type: none"> <li>1. Entity has excellent record of employment individuals of diverse cultural and ethnic backgrounds;</li> <li>2. Provides regular training to board and staff on cultural diversity and sensitivity;</li> <li>3. Is recognized in community for efforts to promote unity and acceptance of all races;</li> <li>4. Has strong entity policy prohibiting discrimination and any mistreatment of people;</li> <li>5. Regularly monitors compliance of entity policies and strictly enforces violation.</li> </ol>
		CUL. SENSITIVITY & COMPETENCE SAFE/SELF-SUFFICIENT	<ol style="list-style-type: none"> <li>1. Has established policies which prohibits the mistreatment of individuals based on cultural differences, race, sex or religion preference;</li> <li>2. Provides training to board and staff to promote cultural sensitivity;</li> <li>3. Promotes inclusiveness through programs and activities;</li> <li>4. Have fair and just hiring practices.</li> </ol>
		CUL. SENSITIVITY & COMPETENCE STABLE	<ol style="list-style-type: none"> <li>1. Has made efforts in the community to recognize cultural diversity and promote sensitivity and awareness;</li> <li>2. Meet all federal and state requirements of compliance against discrimination;</li> <li>3. Has established and/or adopted policies to ensure entity compliance;</li> <li>4. Have no complaints of discrimination or insensitivity.</li> </ol>
		CUL. SENSITIVITY & COMPETENCE AT-RISK	<ol style="list-style-type: none"> <li>1. Has made no efforts, nor taken stand in community to promote cultural diversity;</li> <li>2. Has federal mandates against discrimination, but has no local entity or policy;</li> <li>3. Has selective hiring practices;</li> <li>4. Has no training for board and staff on cultural sensitivity;</li> <li>5. Does not monitor staff action for compliance.</li> </ol>
		CUL. SENSITIVITY & COMPETENCE IN-CRISIS	<ol style="list-style-type: none"> <li>1. Has had numerous complaints for unfair hiring practices;</li> <li>2. Does not investigate allegations of misconduct by board members or staff;</li> <li>3. Has been in violation of federal and state non-discrimination laws;</li> <li>4. Has poor record in community for advocacy.</li> </ol>

## ROMA ENTITY DEVELOPMENT GOAL 8

### COMMUNITY DEVELOPMENT IMPACT

Please identify using the following matrix levels the current status of each goal within your entity and your projected status for this program year. Please attach a brief description of the actions to be taken to achieve desired goals.

Current Status	PROJECTED STATUS FOR PROGRAM YEAR	MATRIX LEVEL	MATRIX CRITERIA
		COMM. DEV. IMPACT THRIVING	<ol style="list-style-type: none"> <li>1. Entity is viable in community and considered a major employer;</li> <li>2. Has several ventures to improve the condition of community and its economic base;</li> <li>3. Actively works to remove a condition which stifle the productive development of residents;</li> <li>4. Has stake in community and commits resources towards its development.</li> </ol>
		COMM. DEV. IMPACT SAFE/SELF-SUFFICIENT	<ol style="list-style-type: none"> <li>1. Has established long-term goals for community development;</li> <li>2. Board and staff work to change conditions in community which prohibits growth;</li> <li>3. Has achieved short-term and established long-term goals for community development.</li> </ol>
		COMM. DEV. IMPACT STABLE	<ol style="list-style-type: none"> <li>1. Entity working toward meeting short-term community development goals.</li> </ol>
		COMM. DEV. IMPACT AT-RISK	<ol style="list-style-type: none"> <li>1. Goals for community development set, but there is no viable impact in community;</li> <li>2. Community support limited.</li> </ol>
		COMM. DEV. IMPACT IN-CRISIS	<ol style="list-style-type: none"> <li>1. Entity has not included community development as part of mission;</li> <li>2. No set goals for community development;</li> <li>3. Has no community involvement or support.</li> </ol>

## ROMA ENTITY DEVELOPMENT GOAL 9

### CLIENT SATISFACTION

Please identify using the following matrix levels the current status of each goal within your entity and your projected status for this program year. Please attach a brief description of the actions to be taken to achieve desired goals.

Current Status	PROJECTED STATUS FOR PROGRAM YEAR	MATRIX LEVEL	MATRIX CRITERIA
		CLIENT SATISFACTION THRIVING	<ol style="list-style-type: none"> <li>1. Clients readily show appreciation of entity for services offered;</li> <li>2. Clients feel complete confidence in entity and its ability and willingness to help;</li> <li>3. Clients are fully knowledgeable of entity services;</li> <li>4. Entity service to clients rated as excellent or outstanding by funding sources and clients alike.</li> </ol>
		CLIENT SATISFACTION SAFE/SELF-SUFFICIENT	<ol style="list-style-type: none"> <li>1. Entity set high priority on client involvement;</li> <li>2. Goals for entity include client satisfaction;</li> <li>3. Bi-annual evaluations are done to measure degree of success;</li> <li>4. Entity is well known in community;</li> <li>5. Entity has established partnerships to increase its capacity to meet client's need.</li> </ol>
		CLIENT SATISFACTION STABLE	<ol style="list-style-type: none"> <li>1. Clients are involved in entity planning process;</li> <li>2. Workers seek to meet client's need in comfortable environment;</li> <li>3. Regular program evaluation is done to ensure compliance;</li> <li>4. Clients feel good about entity and believe their needs will be met.</li> </ol>
		CLIENT SATISFACTION AT-RISK	<ol style="list-style-type: none"> <li>1. Entity has own agenda, of which client services is not a high priority;</li> <li>2. Clients are hesitate to request assistance;</li> <li>3. Entity does not welcome client input in planning process;</li> <li>4. Program evaluation is seldom done.</li> </ol>
		CLIENT SATISFACTION IN-CRISIS	<ol style="list-style-type: none"> <li>1. Community needs assessment are not done;</li> <li>2. Programs are designed without client input;</li> <li>3. Clients not informed of available services;</li> <li>4. Clients made to feel uncomfortable in asking for services;</li> <li>5. Worker's attitude is negative;</li> <li>6. Clients do not feel entity can or will meet their needs;</li> <li>7. Entities capacity to achieve results for clients is non-existent.</li> </ol>

## ROMA ENTITY DEVELOPMENT GOAL 10

### SELF-SUFFICIENCY IMPACT

Please identify using the following matrix levels the current status of each goal within your entity and your projected status for this program year. Please attach a brief description of the actions to be taken to achieve desired goals.

Current Status	PROJECTED STATUS FOR PROGRAM YEAR	MATRIX LEVEL	MATRIX CRITERIA
		SELF-SUFFICIENCY IMPACT THRIVING	<ol style="list-style-type: none"> <li>1. Entity no longer dependent on federal funds for operation;</li> <li>2. Fund development efforts generate working capital;</li> <li>3. Board and staff morale at high level;</li> <li>4. Self-sufficiency goals updated annually;</li> <li>5. Entity has total community support.</li> </ol>
		SELF-SUFFICIENCY IMPACT SAFE/SELF-SUFFICIENT	<ol style="list-style-type: none"> <li>1. Entity has working partnerships in community which generate funds;</li> <li>2. Excellent community support;</li> <li>3. Long-term goals established to remove dependence on federal funds;</li> <li>4. Board and staff actively working on plan;</li> <li>5. Entity supporting over 50% of operating costs.</li> </ol>
		SELF-SUFFICIENCY IMPACT STABLE	<ol style="list-style-type: none"> <li>1. Entity has good community support;</li> <li>2. Receives local funds from community;</li> <li>3. Has developed plan for increasing funding base;</li> <li>4. Board and staff actively involved in plans;</li> <li>5. Have decreased some dependence on federal funds.</li> </ol>
		SELF-SUFFICIENCY IMPACT AT-RISK	<ol style="list-style-type: none"> <li>1. Makes no efforts to increase funding base;</li> <li>2. Has no long-term goals for self-sufficiency;</li> <li>3. Heavily dependent on federal funds;</li> <li>4. Community support limited.</li> </ol>
		SELF-SUFFICIENCY IMPACT IN-CRISIS	<ol style="list-style-type: none"> <li>1. Board and staff have low morale;</li> <li>2. Board and staff set inappropriate priorities;</li> <li>3. Entity totally depended on federal funds;</li> <li>4. Has no support in community.</li> </ol>

## 2015 CSBG Outcome Indicator Measurement Goals

In the categories listed below, please provide the number of clients your agency will assist in obtaining the listed outcomes goals:

Employment		Education	
# of people served		# of people served	
	In Crisis		In Crisis
	At-Risk		At-Risk
	Stable		Stable
	Self-Reliant		Self-Reliant
	Thriving		Thriving
	Received a full time job above minimum wages		Completed Literacy/ABE Training
	Received a full time job with minimum wages		Completed GED
	Received a part job above minimum wages		Completed vocational training/acquired job skills
	Received a part time job with minimum wages		Graduated with a 2-year degree
	Received training, job application assistance, and resume writing.		Graduated with a 4-year degree
	Received vocational training, internships, on-the-job training, and summer jobs.		Assisted with child care classes
	Received supportive services (i.e. counseling, transportation, child care, and the purchase of uniforms or work clothing.		Assisted with programs to enhance academic achievement of students in grades K-12 (i.e., drug or alcohol use and preventing violence )
			Assisted with scholarship for college of technical school
			Alternative opportunities for school dropouts and those at-risk of dropping out

## 2015 CSBG Outcome Indicator Measurement Goals

In the categories listed below, please provide the number of clients your agency will assist in obtaining the listed outcomes goals:

Emergency Services	Health & Safety
# of people served	# of people served
In Crisis	In Crisis
At-Risk	At-Risk
Stable	Stable
Self-Reliant	Self-Reliant
Thriving	Thriving
Emergency temporary housing	Health insurance: non-employer
Assisted with rental/mortgage and/or provided intervention with landlords	Health Insurance: employer
Energy crisis assistance and utility shut-off prevention	Home is safe and fully accessible
Assisted with emergency food, clothing and furniture	Family has identified physician/clinic
Assisted with crisis intervention to child or spousal abuse	Individual has permanent care provider
Assisted with emergency heating system repair	Completed health education training
Linkages with other services and organizations to assemble a combination of short-term resources and long-term support	Clear evidence of good personal hygiene
	Partnering with health institutions (i.e., health screening, immunization, prenatal care, maternal health, and infant health screenings, dental care, substance abuse and other serious health problems
	Transportation to health care facilities and medical appointments

## 2015 CSBG Outcome Indicator Measurement Goals

In the categories listed below, please provide the number of clients your agency will assist in obtaining the listed outcomes goals:

Income Management		Housing	
# of people served		# of people served	
	In Crisis		In Crisis
	At-Risk		At-Risk
	Stable		Stable
	Self-Reliant		Self-Reliant
	Thriving		Thriving
	Completed money management skills training		Safe and adequate housing: subsidized
	Debt free		Safe and adequate housing: single family rental
	Monthly income meets/exceeds expenses		Safe and adequate housing: single family owner
	Has a checking account		Spending less than 1/3 of income on housing
	Has a savings account		Home has been weatherized
	All income is from wages/salaries		Home has been repaired/rehabilitated
	Consumer credit counseling		Assisted in providing transitional shelter, group home and/or services for the homeless
	Tax counseling and tax preparation assistance		Assisted in home ownership counseling and loan assistance
	Assistance for the elderly with claims for medical and other benefits		

## 2015 CSBG Outcome Indicator Measurement Goals

In the categories listed below, please provide the number of clients your agency will assist in obtaining the listed outcomes goals:

<b>Nutrition</b>						
	# of people served					
	In Crisis					
	At-Risk					
	Stable					
	Self-Reliant					
	Thriving					
	Free of government assistance for food					
	Require limited government assistance					
	Assisted families with meals in group settings					
	Completed nutritional education training					
	partnering with food supplies and/or management support					
	Help initiate self-help projects, such as community gardens, community canneries and food buying groups.					

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**Title18: Human Services**

**Part 15: Division of Community Services**

**Part 15 Chapter 1: Community Service Block Grant (CSBG)**

*Rule 15.1 Community Service Block Grant (CSBG) State Plan*

Source: Miss Code Annotated 43-1-2.

**COMMUNITY SERVICES BLOCK GRANT (CSBG)**

**MODEL PLAN**

**FISCAL YEAR (FY) 2015**

**GRANTEE: STATE OF MISSISSIPPI**

**EIN: 64-6000807**

**ADDRESS: MISSISSIPPI DEPARTMENT OF HUMAN SERVICES  
DIVISION OF COMMUNITY SERVICES  
POST OFFICE BOX 352  
JACKSON, MISSISSIPPI 39205**

**DIRECTOR/ADMINISTRATOR OF DESIGNATED STATE AGENCY: Tina M. Ruffin**

**E-MAIL: Tina.Ruffin@mdhs.ms.gov**

**TELEPHONE: (601) 359-4768 FAX: (601) 359-4370**

**Department of Health and Human Services  
Administration for Children and Families  
Office of Community Services  
Washington, DC 20447**

**OMB Control No. 0970-0382**

**Expiration Date: 08/31/2016**

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.

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## **INTRODUCTION**

This State Plan serves as the State of Mississippi's application for Federal CSBG funding. The Plan describes Mississippi's proposed use of FFY 2015 CSBG funding to produce positive outcomes targeted toward the elimination of the causes and effects of poverty.

Following the lead of NASCSP, the Mississippi Department of Human Services-Division of Community Services (MDHS-DCS) is committed to a process that fosters the following:

**“Mutual Respect”**- In working with grantee boards, staff and consultants, CSBG offices value and recognize the unique knowledge, ability and independence of each person. CSBG offices are committed to treating all persons fairly and maintaining credibility by matching actions with words.

**“Open Communication”**- Effective communication is the key to facilitating good working relationships with partners, and CSBG offices are committed to keeping lines of communication open. The purpose of communication is to assist in developing solutions to problems, to share program improvement, ideas, and provide information on new developments in the anti-poverty fields. CSBG offices communicate frequently through a variety of tools and media. CSBG offices are open to contact and are committed to listening to suggestions/concerns and to gain an understanding of local operations and to assist locals in pursuing priorities.

**“Joint Problem Solving”**- CSBG offices operate under the basic belief that a team approach to problem solving is in the best interest of all parties involved. CSBG offices sincerely believe that collectively the office and the entity can arrive at the best solution to any situation. Through a team approach to problem solving, CSBG offices think outside the traditional ways to come up with the best strategies for program development, conflict resolution, or compliance issues. CSBG offices want to promote an environment in which the office and all Community Action partners will be open to change and can work together in exploring options and developing mutually agreeable solutions. The goal is to have entities function independently with CSBG office support in an effort to meet the needs of local communities within the parameters set by legislation. (NASCSP, 2006)

### **The Community Services Block Grant and Community Action Agencies**

In 1964, President Lyndon Johnson signed the Economic Opportunity Act and declared War on Poverty in America. Federal funding from the Economic Opportunity Act facilitated the creation of hundreds of locally designed and governed organizations to address poverty issues at the community level. These entities were called “community action entities”.

In 1981, with the creation of a state block grant program, the Community Services Block Grant (CSBG) replaced the system of direct Federal funding to local community action entities.

Originally created as a part of the Omnibus Budget Reconciliation Services Act of 1981, CSBG has undergone a number of important Congressional reauthorizations. The primary focus of the program, however, has remained solid - to address the causes and effects of poverty through locally designed strategies.

### **Characteristics Common to Mississippi's Community Action Agencies**

The state has eighteen (18) eligible entities encompassing Community Action Agencies/Human Resource Agencies (CAAs/HRAs) that provide an array of services designated to ameliorate the causes and effects of poverty in the low-income communities. In 2005, the state mandated that eligible entities utilize a revised case management plan approach as the blueprint for service delivery.

The CAAs administer seven (7) Head Start Programs in the State. Thus, we have also engaged memorandums of understanding to coordinate services with Head Start personnel in the State to assure that low-income clients were afforded all opportunities to become successful. As research points out, over 90% of all Head Start families are eligible for CSBG services. The combined efforts of CSBG/LIHEAP and Head Start personnel will allow, encourage and support shared informational files, service delivery plans, outreach activities and support systems in assisting low-income Mississippians to becoming self-sufficient. MDHS-DCS will further enhance previous partnerships formed with WIN Job Centers, legal services, community health centers, area colleges and universities to continue the educational development of the staff to meet the ever changing needs and demands of the low income community. CAAs must also provide additional training for support staff in accounting and computer usage to assure accountability in the disbursement of funds and collection of data to support outcome measures established by the entity.

## **FFY 2015 MISSISSIPPI CSBG STATE PLAN**

### **I. Federal and Fiscal Year Covered by this State Plan and Application**

This document is the Mississippi CSBG State Plan and Application for FFY 2015, beginning January 1, 2015 and concluding December 31, 2015.

### **II. Letter of Transmittal**

A letter of transmittal addressed to the Office of Community Services has been included as part of Appendix A. The letter includes contact information for MDHS-DCS staff that is responsible for the administration of CSBG within the State of Mississippi.

### **III. Executive Summary**

#### **A. CSBG State Legislation**

Mississippi does not have State statutes specific to CSBG.

## **B. Designation of a Lead State Entity to Administer the CSBG Program**

The designated lead entity for CSBG in the State of Mississippi is the Mississippi Department of Human Services-Division of Community Services.

The letter of designation has been included within this State Plan (see Appendix A).

## **C. Legislative Public Hearing Requirements**

### **4. Public Hearing**

A public hearing was held on the FFY 2015 CSBG State Plan on June 10, 2014. Notice of the public hearing appeared in the Clarion Ledger, with statewide distribution, and nine other newspapers on June 6, 2014. Copies of the documentation pertaining to the legislative public hearing are included in this application as Appendix H.

### **5. Legislative Public Hearing**

A legislative public hearing was held on the FFY 2015 CSBG State Plan on June 10, 2014. Notice of the public hearing appeared in the Clarion Ledger, with statewide distribution, and nine other newspapers on June 6, 2014. Copies of the documentation pertaining to the legislative public hearing are included in this application as Appendix H.

### **6. Public Inspection of the Plan**

An administrative procedures notice is filed with the Secretary of State twenty (20) calendar days before the Public Hearing. At any time within the twenty (20) day public comment period, written submissions including arguments, data, and views on the proposed rule/amendment/repeal may be submitted to the agency. The proposed plan is also uploaded to the State database for comments and feedback from eligible entities thirty (30) days before the Public Hearing.

The availability of the FFY 2015 CSBG State Plan for inspection was made known in the Public Hearing announcement described above. The State Plan was made available for public inspection by calling the MDHS-DCS, as stated in the legislative public hearing notice. Opportunities for comment were also available during the public hearing held at 10:00 am on June 10, 2014 at the Mississippi State Capitol, 400 High Street, Room 113, Jackson, Mississippi.

#### **IV. Statement of Federal and CSBG Assurances (which include programmatic, administrative, financial and certifications)**

As part of the application and plan required by Section 676 of the Community Services Block Grant Act (The Act), as amended (42 U.S.C. 9901 et seq.), the designee of the chief executive of the State of Mississippi hereby agrees to the Assurances in Section 676 of the Act.

##### **A. Programmatic Assurances**

1. Funds made available through this 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 part A of title IV of the Social Security Act (42 USC 601 et seq.), homeless families and individuals, migrant or seasonal farm workers, and elderly low-income individuals and families to enable the families and individuals:
  - i. To remove obstacles and solve problems that block the achievement of self-sufficiency (including self-sufficiency 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 low-income families in the communities involved, which may include carrying out 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 family and individual needs; and
  - 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 entities, local housing authorities, private foundations, and other public and private partners to document best practices based on successful grassroots intervention in urban areas, to develop methodologies for widespread replication; and strengthen and improve relationships with local law enforcement entities, which may include participation in activities such as neighborhood or community policing efforts;

- b) To address the needs of youth in low-income communities through youth development programs that supports 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: programs for the establishment of violence-free zones that would involve your development and intervention models (such as models involving youth mediation, youth mentoring, life skill training, job creation, and entrepreneurship programs); and after-school child care programs;
  - c) To make more effective use of, and to coordinate with, other programs (including State welfare reform efforts). [676(b) (1)]
- 2. To describe how the State intends to use discretionary funds made available from the remainder of the grant or allotment described in section 675C (b) of the Act in accordance with the community services block grant program, including a description of how the State will support innovative community and neighborhood-based initiatives related to the purposes of the community services block grant program. [676(b) (2)]
- 3. To provide information provided by eligible entities in the State, including:
  - a) a description of the service delivery system, for services provided or coordinated with funds made available through grants made under section 675C(a) of the Act, targeted to low-income individuals and families in communities within the State;
  - b) a description of how linkages will be developed to fill identified gaps in services, through the provision of information, referrals, case management, and follow-up consultations;
  - c) a description of how funds made available through grants made under section 675(a) will be coordinated with other public and private resources; and,
  - d) a description of how local entities will use the funds to support innovative community and neighborhood-based initiatives related to the purposes of the community services block grant, which may include fatherhood initiatives and other initiatives with the goal of strengthening families and encouraging effective parenting. [676(b) (3)]
- 4. To ensure 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. [676(b) (4)]

5. That the State and the 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 to low-income individuals and to avoid duplication of such services, and a description of how the State and the eligible entities will coordinate the provision of employment and training activities in the State and in communities with entities providing activities through statewide and local workforce investment systems under the Workforce Investment Act of 1998. [676(b) (5)]
6. That the State will ensure coordination between anti-poverty 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 communities. [676(b) (6)]
7. To permit and cooperate with Federal investigations undertaken in accordance with section 678D of the Act. [676(b) (7)]
8. To ensure that any eligible entity in the State that received funding in the previous fiscal year through a community services block grant under the community services block grant program 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) of the Act. [676(b) (8)]
9. 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. [676(b) (9)]
10. To 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. [676(b) (10)]
11. To secure from each eligible entity in the State, as a condition to receipt of funding, 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. [676(b) (11)]
12. That the State and all eligible entities in the State will, not later than fiscal year 2001, participate in the Results Oriented Management and Accountability System,

another performance measure system for which the Secretary facilitated development pursuant to Section 678E(b), or an alternative system for measuring performance and results that meets the requirements of that section, and a description of outcome measures to be used to measure eligible entity performance in promoting self-sufficiency, family stability, and community revitalization. [676(b) (12)]

13. To provide information describing how the State will carry out these assurances. [676(b) (13)]

## **B. Administrative and Financial Assurances**

The State of Mississippi agrees to the following, as required under the Act:

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(b)] –
2. To use not less than ninety (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, subject to the provisions regarding recapture and redistribution of unobligated funds outlined below. [675C(a)(1) and (2)]
3. In the event that the State elects to recapture and redistribute funds to an eligible entity through a grant made under Section 675C(a)(1) when unobligated funds exceed twenty (20) percent of the amount so distributed to such eligible entity for such fiscal year, the State agrees to redistribute recaptured funds to an eligible entity, or require the original recipient of the funds to redistribute the funds to a private, nonprofit organization, located within the community served by the original recipient of the funds, for activities consistent with the purposes of the Community Services Block Grant program. [675C (a)(3)]
4. To spend no more than the greater of \$55,000 or five (5) percent of its grant received under Section 675A or the State allotment received under section 675B for administrative expenses, including monitoring activities. [675C(b)(2)]
5. In states with a charity tax credit in effect under state law, the State agrees to comply with the requirements and limitations specified in Section 675© regarding use of funds for statewide activities to provide charity tax credits to qualified charities whose predominant activity is the provision of direct services within the United States to individuals and families whose annual incomes generally do not exceed 185 percent of the poverty line in order to prevent or alleviate poverty among such individuals and families. [675(c)]

6. That the lead agency will hold at least one hearing with sufficient time and statewide distribution of notice to provide to the public an opportunity to comment on the proposed use and distribution of funds to be provided through the grant under Section 675A or 675B for the period covered by the State plan. [676(a)(2)(B)]
7. The chief executive officer of the State will designate, and appropriate State Agency for purposes of carrying out State community services block grant program activities. [676(a)(1)]
8. That the lead agency will 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)]
9. To make available for the public inspection each plan in such a manner as will facilitate review of and comment on the plan. [676(e)(2)]
10. To conduct the following reviews of eligible entities:
  - a) Full onsite review of eligible entity at least once during three-year period;
  - b) An onsite review of newly designated entity immediately after the completion of the first year in which entity receives funds through the community services block grant;
  - c) Follow-up reviews including prompt return visits to eligible entities, and their programs, that fail to meet the goals, standards, and requirements established by the State;
  - d) Other reviews as appropriate, including reviews of entities with programs that have had other Federal, State, or local grants (other than assistance provided under the community service block grant program) terminated for cause. [678B(a)]
11. In the event the State determines that an eligible entity fails to comply with the terms of an agreement or the State plan, to provide services under the community services block grant program or to meet appropriate standards, goals, and other requirements established by the State (including performance objectives), the State will comply with the requirements outlined in Section 678C of the Act, to:
  - a) Inform the entity of the deficiency to be corrected;
  - b) Require the entity to correct the deficiency;

- c) Offer training and technical assistance as appropriate to help correct the deficiency, and submit the Secretary a report describing the training and technical assistance offered or stating the reasons for determining that training and technical assistance are not appropriate;
  - d) Offer the eligible entity an opportunity to develop and implement, within 60 days after being informed of the deficiency, a quality improvement plan and to either approve the proposed plan or specify reasons why the proposed plan cannot be approved;
  - e) After providing adequate notice and an opportunity for a hearing, initiate proceedings to terminate the designation of or reduce the funding to the eligible entity unless the entity corrects the deficiency. [678(C)(a)]
12. To establish fiscal controls, procedures, audits and inspections, as required under Section 678D (a) (1) and 678D (2) of the Act.
  13. To repay to the US amounts found not to have been expended in accordance with the Act, or the Secretary may offset such amounts against any other amount to which the State is or may become entitled under the community service block grant program. [678D (a) (3)]
  14. To participate, by October 1, 2001, and ensure that all eligible entities in the State participate in the Results-Oriented Management and Accountability (ROMA) System [678(a) (1)]
  15. To prepare and submit an annual report on the measured performance of the State and its eligible entities, as described under 678E (a) (2) of the Act.
  16. To comply with the prohibition against use of community services block grant funds 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, as described in Section 678F(a) of the Act.
  17. To ensure that programs assisted by community services block grant funds shall not be carried out in a manner involving the use of program funds, the provision of services, or the employment or assignment of personnel in a manner supporting or resulting in the identification of such programs with any partisan or nonpartisan political activity or any policy activity associated with a candidate, or contending faction or group, in an election for public or party office; any activity to provide voters or prospective voters with transportation to the polls or similar assistance with any such election, or any voter registration activity. [678F (b)]

18. To ensure that no person shall, on the basis of race, color, national origin or sex be excluded from participation in, be denied the benefits of, or be subjected to discrimination under, any program or activity funded in whole or in part with community services block grant program funds. Any prohibition against discrimination on the basis of age under the Age Discrimination Act of 1975 (42 U.S.C. 6101 et seq.) or with respect to an otherwise qualified individual with a disability as provided in Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 12131 et. Seq.) shall also apply to any such program or activity. [678F(c)]
19. To consider religious organizations on the same basis as other non-governmental organizations to provide assistance under the program so long as the program is implemented in a manner consistent with the Establishment Clause of the first amendment to the Constitution; not to discriminate against an organization that provides assistance under, or applies to provide assistance under the community services block grant program on the basis that the organization has a religious character; and not to require a religious organization to alter its form of internal government except as provided under Section 678B or to remove religious art, icons, scripture or other symbols in order to provide assistance under the community services block grant program. [679]

### C. Other Administrative Certifications

The State also certified the following:

1. Provide assurances that cost and accounting standards of the Office of Management and Budget (OMB Circular A-110 and A-122) shall apply to eligible entities who are recipients of the community services block grant program funds.
2. To comply with the requirements of Public Law 103-227, Part C Environmental Tobacco Smoke, also known as the Pro-Children Act of 1994, which requires that smoking not be permitted in any portion of any indoor facility owned or leased or contracted for by an entity and used routinely or regularly for the provision of health, day care, education, or library services to children under the age of 18 if the services are funded by a Federal grant, contract, loan or loan guarantee. The State further agrees that it will require the language of this certification be included in any subawards, which contain provisions for children’s services and that all subgrantees shall certify accordingly.

“Signature (indicates the sign off of assurances in previous Section IV)”

---

Richard A. Berry, Executive Director  
Mississippi Department of Human Services

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Date

## **VI. CSBG State Plan Narrative**

### **A. Administrative Structure**

#### **1. State Administrative Entity, Mission and Objectives**

The Mississippi CSBG is administered by the Mississippi Department of Human Services-Division of Community Services. MDHS is a primary link between families and individuals with specific needs vital to their survival and the services available to meet those needs.

The mission of MDHS is to deliver, within established guidelines, a broad range of services to a diverse population in a professional, timely, accurate and compassionate manner. MDHS will further its mission by assisting those in need to overcome adversity, dependency, lack of self-esteem, gain self-confidence and self-sufficiency. It supports the community action vision and values through:

- a) Professional, accountable and responsible administration of CSBG
- b) Development of effective partnerships with CSBG entities, MDHS-DCS, and other State and Federal programs targeting low-income individuals.

Goals and Objectives:

The state will carry out the following goals, objectives and assurances as stated in Section 672 of the CSBG Act as amended, as follows:

- a) Emphasize the need for legal, effective and quality board of directors ensuring more diversity in service delivery, Community Involvement and Partnerships.
- b) Require entities to develop a comprehensive employment plan informing clients about the availability of jobs, training opportunities, resume development and employer outreach plan.
- c) Require entities to secure formal partnerships with primary health care entities, WIN Job Centers, community health centers and legal services to accept referrals from CAAs and assist eligible clients with desired services where possible.
- d) Require entities to develop and implement an entity outreach plan targeted to meet the challenges of elderly, disabled citizens, children with special needs and emergency disaster services.
- e) Require entities to develop and implement a non-monetary client assistance plans that will prepare clients for self-reliance or stability where funds or other

financial resources are not available or the client is not in compliance with the service plan.

- f) Encourage eligible entities to sponsor summer projects/activities for low-income youth to promote youth employment and enrichment.
- g) Require eligible entity to maintain Virtual ROMA compliance.
- h) Require improvement plans for challenged entities, to provide for a greater opportunity to be successful. Mandate that entities provide a performance improvement plan for success.
- i) Require entities to provide a comprehensive plan for Earned Income Tax Credit (EITC) Program and describe how it will be incorporated into case management for clients.
- j) Require that entities develop an informational package for clients. This package should be inclusive to the following: child support literature, child abuse/neglect literature, disaster relief plan, fair hearing procedures form(s) and information on all services provided by the entity.
- k) Require that entities provide a plan for client orientation in every service area to include when a brief or an abbreviated orientation is acceptable.
- l) Require that entities refer all non-elderly, non-disabled clients to the WIN Job Center.
- m) Require that entities provide a Crisis Plans for client services that relates to emergency and life threatening situations. This plan must include an 18 to 48 hour emergency and/or life threatening situation.
- n) Require that entities provide a Comprehensive Plan for follow-up to state entity on client complaints within the 24 hour timeframe.
- o) Require that entities meet the Organizational Standards.
- p) Require that entities participate in the ACH process for paying all energy vendors.
- q) Require entities to submit subgrant proposals, financial and programmatic reports through Mississippi's Accountability System for Government Information and Collaboration (MAGIC).

2. Eligible Entities

- a) Eighteen (18) designated CSBG-eligible entities presently exist in Mississippi. A list of the eligible entities is found in Appendix C.

3. Distribution and Allocation of Funds

In accordance with the CSBG Act:

- a) Ninety (90) percent of the State of Mississippi's total CSBG allocation will be distributed to the State's eligible entities.
- b) Five (5) percent of the State of Mississippi's total CSBG allocation will be distributed for discretionary projects related to the stated purposes and intended outcomes of the CSBG Act.
- c) Up to five (5) percent of the State of Mississippi's total CSBG allocation may be used for administration of CSBG. It will be the intent of MDHS-DCS to apply unspent CSBG administrative resources to discretionary projects related to the stated purposes and intended outcomes of the CSBG Act.

**B. Criteria and Formula for the Distribution of CSBG Funds**

The State will contract with eligible entities during Program Year 2015, beginning January 1, 2015 through December 31, 2015. Funds are obligated effective January 1 in accordance with MDHS Sugerantee Manual.

Allocable FFY 2015 Mississippi CSBG funds will be distributed on a formula basis, based on the percentage (latest Census data) of the poor population in a county compared to the statewide percentage (pending Federal allocation to the State of Mississippi). The CSBG subgrant allocations will use the following factors:

1. Twenty-five (25) percent of each eligible entities allocation **must** be allocated to the Supportive Services activity for direct client services.
2. Fifteen (15) percent of each eligible entities allocation may be used for the Administrative activity.
3. Sixty (60) percent of each eligible entities allocation may be used for the Case Management activity.

**TENTATIVE FFY 2015 ALLOCATIONS**

(These levels are dependent on the Federal CSBG award at the FFY 2014 level.  
Adjustments will be made once the final FFY 2015 awards are known.)

<b>Eligible Entity</b>	<b>Est. Allocation</b>
AJFC CAA	\$ 497,842
Bolivar Co CAA	\$203,663
Central Mississippi	\$620,945
Coahoma Opportunities	\$144,827
Gulf Coast CAA	\$583,833
Hinds County HRA	\$807,410
Jackson Co CAC	\$289,654
Lift	\$783,875
Mid-State Opportunities	\$575,687
Multi County CSA	\$764,867
Northeast MS	\$349,395
PRVO	\$1,065,383
Prairie Opportunity	\$710,557
South Central CAA	\$476,118
Southwest MS	\$305,042
Sunflower-Humphreys Co	\$195,516
United CAA	\$107,715
WWISCAA	\$570,256
<b>Total</b>	<b>\$9,051,678</b>

The 2010 Census prompted a review of the distribution formula and necessitated modification of each entities proportionate share.

Use of CSBG funds will be specifically limited to the stated purposes and requirements of the CSBG Act as allowed by applicable Federal and State regulations.

**Recapture and Redistribution Options** - During the current CSBG Program Year, while administering the ninety (90) percent of funds passed through the State of Mississippi to eligible entities, MDHS-DCS will not exercise the recapture and redistribution options granted under subsection 675C(a)(3) of the CSBG Act. CSBG funds are awarded to eligible entities on a 12-month basis; however, recipients are given 18 months to expend the funds.

### **C. Distribution and Use of Restricted Funds**

Ninety (90) percent of CSBG funds received by the State of Mississippi will be subgranted to benefit the State's designated CSBG-eligible entities.

In recent years, Mississippi has made a significant transition into an outcomes-oriented system of service delivery. As a result, eligible entities are required to focus their CSBG-supported activities on the six nationally identified CSBG goals.

1. Low-income people become more self-sufficient.
2. The conditions in which low-income people live are improved.
3. Low-income people own a stake in their community.
4. Partnerships among supporters and providers of services to low-income people are achieved.
5. Entities increase their capacity to achieve results.
6. Low-income people, especially vulnerable populations, achieve their potential by strengthening family and other supportive systems.

It is the nature and intentional design of CSBG to enable the creation of locally designed and administered solutions to poverty. Therefore, the specific methods and strategies by which eligible entities pursue the six national goals will vary from entity to entity. All eligible entities, however, will be required to use CSBG funding for the stated purposes within the CSBG Act. Mississippi community action entities have traditionally provided, and will continue to provide, services directly to low-income consumers and they will continue to serve as catalysts to community organization and coordination necessary for the development of additional services. While local-level strategies vary, based on

identified needs and available resources, service delivery will focus on the broad categories identified in the CSBG Act.

1. Self-Sufficiency
2. Better Use of Income
3. Community Coordination
4. Youth Development Programs
5. Community Participation

Projects and programs supported by CSBG resources will produce measurable outcomes in at least one of the six national goals and will be targeted to at least one of the identified service categories.

#### **D. Description of Distribution and Use of Discretionary Funds - 676(b) (2)**

MDHS-DCS will allocate at least 5 percent of CSBG funds received by the State for FFY 2015 to support discretionary projects related to the purposes of the CSBG Act and the six national goals.

A percentage of discretionary funds are allocated based on the following activities:

1. Capacity building- 57%: to include T&TA, IT needs for the Virtual ROMA system, staff training and ACH;
2. Corrective Action- 8%: to include partnerships with the state CAA association to assist CAAs with corrective action strategies and;
3. Other CSBG purposes- 35%: to include new and existing community projects for seniors and youth.

In FFY 2015, a portion of CSBG discretionary resources may be set aside to provide:

1. additional training and technical assistance responsive to the needs of the Mississippi network,
2. for activities supportive of community action entities' on-going development and implementation of Virtual ROMA;
3. for quality improvement initiatives,

4. for emergency needs (entity-in-crisis, natural disaster, etc.) and for other state-wide initiatives possibility including a plan to more directly reach counties located within the consortium territory.

The MDHS-DCS priorities for FFY 2015 CSBG discretionary funding will include:

1. Projects that support a sustainable system of continuous quality improvement in community action entity management and performance, including service delivery that moves individuals and families to greater levels of economic self-reliance.
2. One-time enhancement of existing, successful projects or programs directly related to one of the six national goals,
3. Statewide projects which have objectives consistent with the CSBG Act and
4. The development of new, community-based partnerships directly related to one of the six national goals.

#### **E. Description of Use of Administrative Funds**

MDHS-DCS will apply no more than 5 percent of its annual allocation toward State administrative expenses, with a firm belief that state CSBG staff must have ongoing opportunities to grow the requisite skills required to provide Mississippi community action entities with oversight, training and technical assistance and leadership. Professional development will be supported with administrative funds. State CSBG staff will be afforded opportunities, as schedules and MDHS-DCS administration will allow, to participate in the National Association for State Community Services Programs (NASCSPP) training conferences and events, the Community Action Partnership's annual training conference, and National ROMA Peer-to-Peer Trainer in-service events.

State staff, through on-going professional development, will maintain up-to-date knowledge of CSBG requirements and best practice and will be positioned to add value to the process; training and technical assistance will support the continued movement of the State's network beyond compliance and toward excellence.

CSBG administrative funds also assist the State of Mississippi in leveraging additional opportunities for low-income Mississippians through legal services and community health centers, and WIN Job Centers.

In previous years, MDHS-DCS has used unspent CSBG administrative resources to increase the amount of funding available for CSBG discretionary projects.

## **F. State Community Services Program Implementation - 676(b) (3)**

### **1. Program Overview**

#### **a) The Service Delivery System**

The service delivery system used to deliver CSBG services is provided by eligible entities to meet identified community and the needs of eligible families and to produce outcomes based upon the six national goals. Service delivery systems, therefore, vary from entity to entity, just as the communities and people served vary.

Commonalities to the service delivery system include:

- i. Community outreach to ensure awareness of opportunities for low-income people,
- ii. Holistic, family-centered approaches to assessing and addressing individual needs,
- iii. Use of multiple and convenient access points for direct service delivery (most Mississippi community action entities provide multiple locations for client service delivery),
- iv. Provision of multiple and wide-ranging services in order to address the causes and effects of poverty,
- v. Common, entity-wide consumer intake forms and processes and
- vi. Use of community partnerships and inter-entity referral processes to make the most efficient use of available resources.

#### **b) Linkages**

The ability of Mississippi's community action entities to effectively produce outcomes related to the six national goals is intrinsically tied to the creation of a successful system of family and community "linkage."

Mississippi community action entities link individual consumers to multiple resources both within the entity and within the community. It is quite common, for example, for a family to come to a Mississippi community action entity with a presenting issue such as a need for food or utility assistance. Through an initial assessment, needs are mutually identified and the family is informed of available opportunities within the entity (LIHEAP, Weatherization, Head Start, job counseling, family self-sufficiency case management, etc.). Concurrently, entity staff assists the family in identifying and accessing, or "linking" to, additional services available within the community.

Community action entities are required to develop partnerships with social service providers, religious organizations and local governments to, on both a micro- and macro-level, grow the quantity and quality of support and opportunities that are available for those impacted by poverty.

In order to more fully address the needs of families and to evaluate the outcome of their work, Mississippi entities must follow-up with families linked with resources both within and beyond the entity.

c) Coordination with Other Public and Private Resources

Strength of the Mississippi network is the ability of the entities to use their CSBG dollars to leverage additional public and private resources which are then targeted to achieving outcomes within the framework of the six national goals.

In addition to the direct services provided for low-income families and communities, CSBG resources are used to support the infrastructure of Mississippi community action entities. Mississippi's coordinated and comprehensive approaches to eliminating the causes and effects of poverty that are pursued by Mississippi's entities require sound systems of governance and of fiscal and personnel management. CSBG funds allow Mississippi community action entities to develop and maintain these essential systems. The resulting accountability and capacity enable Mississippi entities to access, or leverage, additional public and private resources to further their direct service efforts.

According to the State's 2013 CSBG IS Report, Mississippi community action entities leveraged \$139,194,692. These leveraged resources included public funds from city and county governments, additional Federal dollars, grants from foundations and community-based, grant-making organizations and donations from individual contributors (funding, goods and services).

d) Innovative Community and Neighborhood-Based Initiatives

Mississippi's community action entities have a well-established history of developing innovative and proactive strategies to mitigate the causes and effects of poverty. In FFY 2014, community action entities continue to have an impact through many unique, and innovative, programs made possible by CSBG.

### 3. Community Strength and Needs Assessments

In accordance with the assurance in 676(b)(11) of the Act, MDHS-DCS will secure from each eligible entity in the State, as part of its annual application and as a condition of a financial award, a community action plan which will provide a description of the Community Strengths and Needs Assessment (CSNA) for the community served. The CSNA must be conducted in each county served including citizens from all aspects of the community, public, private, and the poor sector. The CSNA may also include partners, other entities and other programs administered by the entity. The CSNAs are the basis for the ranking of services stated in the community action plan and the budget request.

The community action plan must provide a description of the following:

- a) A description of the comprehensive CSNA to determine the services to be provided based on eligible activities;
- b) A description of outcome measures to be used to monitor success in promoting self-reliance, family stability, and community revitalization.
- c) The entity must state goals and objectives in measurable terms and projected in a quarterly timetable, which indicates when the stated goals and objectives will be accomplished. The strategies employed to achieve the objectives must be adequately described and quantified. This information will also be used in conjunction with Virtual ROMA the Management Information System to measure plan-versus-actual performance levels.
- d) Program activities selected by the eligible entity must be accompanied with a detailed line item budget that describes how CSBG and local and private funds will be effectively used.
- e) A description of the area where new and different methods are to be used in addressing the cause, and/or effect of poverty. A description of what makes this activity different from similar activities and which indicate whether any new concepts, trends, methods, or models are incorporated must be stated in the narrative.
- f) A description of how the entity will provide services during/after a disaster, on weekends, after hours, and during emergencies which must be described in the entities emergency service delivery plan.
- g) A description of how the eligible entity met its prior year's goals and objectives. This report shall include a narrative description of the specific types of projects and activities funded in the prior year CSBG program, and what impact they had on the poverty condition of families and individuals served.

- h) A letter from the auditors which conducted the prior year audit certifying and providing assurances that cost and accounting standards of the Office of Management and Budgets are used by the eligible entity to account for CSBG funds.
- i) An updated governing board of directors and standing committees composition roster.

4. Tripartite Boards - Section 676B (a), (b)

*Board of Directors Composition.* An eligible entities board of directors is governed by 42 USC 9910. The eligible entities board of directors should consist of a minimum of twelve (12) and a maximum of twenty-four (24) members. The board of directors must present a tripartite composition of membership requiring that no less than 1 /3 of the members of the board "are chosen in accordance with democratic selection procedures adequate to assure that these members are representative of low-income individuals and families in the area served." The change in wording from the prior version, which required that these members be representative of "the poor in the area served", reflects an increased emphasis on representation of the neighborhoods which are being served, rather than merely a representation of the larger community. The balance of members should consist of business, labor industry, education, etc., while expanding on and clarifying several of the specific provisions:

- a) Both the elected and the appointed public officials selected by the organizational body on the board shall have general governmental responsibilities which require them to be involved with poverty related matters. The public organizational body official may choose one representative to serve on the board full-time as the public body's official designee. The representative shall be granted full authority to act on behalf of the public body.
- b) Representatives of low-income persons shall be chosen by low-income individuals in accordance with democratic selection procedures adequate to assure that they represent the low- income persons in the geographic area served by the eligible entity. Representatives of low-income persons may be selected to represent either a specific area or neighborhood served by the eligible entity. Among the selection procedures which may be used, either separately or in combination, are nominations and elections either within the neighborhood or within the community as a whole; or, selection at a meeting or conference of low-income persons, such that the date, time and place for a meeting or conference have been adequately publicized.
- c) The eligible entities shall select organizations to be represented on the board in such a manner as to assure that the board will benefit from broad community involvement. Once an organization is selected and indicates its agreement to be represented on the board, it shall choose the person to represent it on the board.

The organizational representatives may be changed only by a majority vote of the board or request of the organizational body to terminate its representation on the board. The by-laws of the eligible entity must include a process for the removal of board members. Anyone representing an organization and/or a business must be a member of the organization or an employee of the business. The organization must be a structured organization with a physical location in the area represented. Appointment or selection of members representing public offices or private organizations shall be made on a revolving or rotating basis to allow total community representation or an opportunity for other interested organizations to nominate a representative to serve.

A person and/or organization can only serve/represent a total of 8 years in all sectors.

Low-income sector board members must be democratically selected by the CSBG Act. The by-laws must describe the selection procedures for low-income representatives. There must be some low-income community involvement in the selection process (e.g., selection "on the basis of some form of democratic procedure, either directly through election, public forum or, if not possible, through a similar democratic procedure process, such as election to a position or responsibility in another significant service or community organization, such as a school PTA, a faith-based organization leadership group, or an advisory board/governing council to another low-income service provider", as is recommended by the Health and Human Services, Office of Community Services Information Memorandum 82).

The entire community must be involved if the mandate of having a measurable and potentially major impact on the causes of poverty to eliminate the effects of poverty is to be met. Therefore, all sectors of the community must be represented on the Board.

Public Officials are included because they represent both the general public and the local government. The success of an eligible entity depends upon its ability to work with and to have the support of this group.

The Poor are included because they know the challenges of poverty. They must participate in programs and activities designed to meet their needs. They must be helped to become empowered if they are to become self-sufficient.

Members of the Private sector are included because they represent the balance of the community. The other groups cannot succeed without the support, resources, and participation of the private sector.

The Board must fully participate in the "development, implementation, and evaluation of the program to serve low-income communities." The revised version also expands on the requirement for a public eligible entity (a government entity) to

have a board of other merchants to assure representation of low-income individuals. The organization may meet this requirement through a board of directors composed of at least one-third individuals chosen through democratic selection procedures who are representative of low-income persons in the neighbor hoods served and "are able to participate actively in the development, planning, implementation, and evaluation of CSBG programs." The public/government organization may also meet this requirement through "another mechanism specified by the state to assure decision making and participation by low-income individuals in the development, planning, implementation, and evaluation of [CSBG] programs." (Community Service Block Grant Act, Subtitle B—Community Service Block Grant, Sec. 676 (b) (2)).

Board members must meet at least bi-monthly and convene special or call meetings as needed.

In accordance with the CSBG Act, MDHS-DCS requires a demonstration that tripartite board members actively participate in the development, planning, implementation and evaluation of the community action program rather than merely provide advice.

Newly elected or appointed board members must submit to twelve hours of specified training relative to federal, state, and local laws, policies, procedures and other governance of eligible entities, entity by-laws, finance, audit, program and board liabilities and responsibilities. This training must take place sixty (60) days after the official seating of member. Board members must submit to eight hours of annual training on the aforementioned areas to be kept abreast of the most recent guidance, information and trends in nonprofit governance.

Board members not meeting these criteria must be removed within fifteen (15) days of official notice of non-compliance.

Each member selected to serve on the Board of Directors must live in that eligible entities CSBG designated service area. Members selected to represent a specific geographic area must live in that area. Board of Directors contact information must be posted on the eligible entities website, thereby enabling community access.

Every county in the service area shall be equally represented on the Board unless otherwise approved by DCS. Each Board shall have an equitable cross section of representation in the service area unless otherwise approved based on population.

Eligible entities should specify in the by-laws particular public officials who may serve on the board. The Board chooses public sector representatives based on the needs at the time. The eligible entities must first look to elected officials. If not enough elected officials are reasonably available and willing to serve, the eligible entities may look to appointed officials (i.e., government officials who were not elected). Eligible entities are not restricted to choosing county commissioner, city

mayors or council members as their elected officials; they may choose other elected officials as well (e.g., city or county board of education members, etc.). If a public body chooses a representative to serve as a board member, that person, is the board member and gets to vote at the board meeting.

The state requires that a public official or representative of a public office, poor or private sector representative shall be elected or appointed, respectively, to serve no more than two (2) lifetime four year terms. However, the board member must be re-elected or appointed to serve the second term. The two terms can be continuous or there may be a break in service. The member can serve no more than eight (8) years in a lifetime. Otherwise, members serving less than eight years will be allowed up to the lifetime limit of eight years. Eligible entities are encouraged to stagger four year term expirations, allowing a reasonable departure of board members during different periods, whereas not to create a governance, compliance, or service delivery problem.

Each board seat must be filled within a sixty (60) day period after the seat has been declared vacant by removal, resignation, etc., unless a written request for waiver has been granted within the sixty (60) day period from DCS. It is further the responsibility of the Board to notify DCS in writing within ten (10) days of any Board membership changes.

Each Board shall provide DCS with a continuous current/update membership roster with supporting documentation maintained on file (eligible entities office) regarding official elections or appointments.

Eligible entities may consider not seating former employees as board members. If so, require them to have left employment for at least one year before joining the board. Entities must prohibit former employees who have been terminated from serving on the board.

Eligible entities should prohibit board members who are federal/state employees from serving in any capacity that would require them to act as an agent for the eligible entity in the dealings with any federal/state government departments or entities.

The by-laws shall list the total number of seats on the board and the allotment of seats to the public officials, representatives of low-income sector and representatives of the private sector.

The by-laws must include procedures for selection of board members. Procedures for the selection of representatives of the low-income sector must ensure that all areas of the low-income community will be represented.

The by-laws must describe any performance standards (such as attendance, etc.) for members of the board, the violation of which may be grounds for removal. These shall include standards of conduct for board members. The standards of conduct

shall specify conditions under which board members may be sanctioned and/or removed.

The by-laws shall include procedures for selecting new board members in the case of a vacancy on the board. For the purpose of this paragraph, there is a vacancy when a term has expired, a member has been notified of his or her official removal by the board, a member submits his or her resignation, or a member who is an appointed public/elected official leaves office. All vacancies shall be filled within 60 calendar days.

The quorum for a meeting of the board shall be at least 50 percent +one of the seats on the board. The board members must meet bi-monthly. The meetings shall be scheduled for the convenience of its members and of the general public. The eligible entities shall provide notice (in writing) of any meeting and an agenda to all members at least 5 calendar days in advance. Electronic notices and agendas, in lieu of paper copies, will also be accepted, provided all members receiving electronic notices have agreed to accept this form of notification. Meeting notices and agendas shall be submitted to MDHS/DCS at the time they are submitted to the board and made available to the general public. The contact information of all board members must be posted on the eligible entities website.

All meetings of the board are subject to the State Open Meetings Act. The board shall conduct its business and keep written minutes of each meeting in accordance with Robert's Rule of Order. Minutes shall be made available to the public upon request. The board shall also make available to the public, upon request, translations of the minutes in the appropriate language where a significant portion of the low-income population does not speak English.

Copies of the minutes of each meeting shall be submitted to the MDHS/DCS program no later than 10 calendar days after the date of the meeting at which those minutes were ratified. If the meeting was not a quorum, the official minutes must be submitted within 3 calendar days of the scheduled meeting.

The Board of Directors may set up as many subcommittees as it requires in order to carry out the responsibilities effectively. The committees - standing and ad hoc must meet the eligible entities current needs. It is required that the Board has at least five Standing Committees. They are: (1) Executive; (2) Planning and Evaluation; (3) Finance; (4) Personnel and; (5) Human Rights Committees. The Board may also change the description of the activities of the standing committees as needed to meet their perspective.

- a) The Executive Committee is responsible for the general conduct of the Board's business on a day to day basis. The major functions of this committee are to act upon urgent matters in a timely manner, establish standing committees and assign members to each, review the major administrative policies and recommend changes or additions to the full Board, provide for adequate legal

counsel for the eligible entity, and to evaluate the eligible entities executive director. The evaluation must be on file with the eligible entity and with the board. All responsibilities are subject to the approval of the full board with instructions.

- b) The Planning and Evaluation Committee develops strategies for planning and achieving objectives and makes continual evaluations of the eligible entities operational goals. The functions of this committee include ensuring that an adequate needs assessment is completed, reviewing and approving programs to be operated by the eligible entity, developing internal reporting standards for programs, recommending funding of specific programs to the full Board, evaluating each program or project on a timely basis, and coordinating efforts of the public and private organizations and the committees in the service area in providing assistance to the eligible entity and to the poor.
- c) The Finance Committee oversees the fiscal functions of the eligible entity. This committee reviews budget proposals prepared by the eligible entity staff and makes recommendations to the Board regarding these proposals, reviews the monthly budget status and the financial reports, ensures that an adequate fiscal management system is in place, assists in securing alternate sources of funding, to review and make recommendations of action needed to the board regarding monthly expenditures, and reports to the full Board on all fiscal matters.
- d) The Personnel Committee is responsible for overseeing personnel functions and certain administrative functions of the eligible entity. The duties of this committee include the review of personnel policies regarding promotions; salary; hiring of employees recommended by the Executive Director; serve the selection committee making recommendations to the full Board when employing an Executive Director; and the promotion of a Career Development Program for professional and non-professional staff.
- e) The Human Rights Committee acts on matters concerning the rights of employees and management. Listening, hearing, fact-finding and providing objective judgments are the core functions of this committee. Other functions include ensuring the protection of the rights of both the eligible entity and the employees as established in the eligible entities Equal Opportunity Plan and recommending approval or denial of it to the Board, hearing equal opportunity complaints and recommending to the Board possible solutions and ensuring due process prior to the termination of an employee.

The board may establish any committee it considers necessary for carrying out its business. Each sector of the board must be fairly represented on such committees. Voting by proxy is not permitted at meetings of the board or of its committees. This prohibition applies to all members of the board.

Each committee membership should reflect the total composition of the Board. Since the full Board establishes committees in order to divide the workload, develop expertise among their members, and to permit decision-making between meetings, careful attention should be made to committee assignments. It is also important that each entity have a board development plan in place to assure adequate membership selection, participation and availability of a knowledgeable group of individuals.

The Board must develop strong removal provisions in the bylaws, consistent with state nonprofit corporation law, which often specifies special notice and other procedural requirements for removal.

The board can remove any director or officer for cause, including but not limited to, for example, false certifications on the application, unexcused absences from a certain number (e.g. three) of consecutive board meetings, failure to comply with the eligible entities conflict of interest policy, and taking actions that are against the best interests of the organization. Eligible entities may consider incapacity as a ground for removal.

Boards should develop a policy that establishes procedures for identifying potential conflicts of interests and determine if a particular transaction that could involve a conflict is in the organization's best interest. The by-laws should require the board to develop and maintain a conflict of interest policy.

All boards must comply with 79-11-509 of the Mississippi Code which governs non-profit corporations.

Eligible entities failure to adhere to said requirements for board of directors maybe declared non-compliant, resulting in a notice to terminate funding.

5. State Charity Tax Program

*Earned Income Tax Credit (EITC) Project*, All eligible entities must provide a plan for EITC and describe how it will be incorporated into case management for clients.

6. Programmatic Assurances

States making application for Federal CSBG funds are required to not only sign and include the complete list of Federal assurances with their annual State Plan, but are also required to describe how the State will comply with each assurance. The Mississippi description of compliance follows.

- a) Assurance 676(b) (1) – Funds made available through the grant or allotment will be used:

- i. To support activities that are designed to assist low-income families and individuals, including families and individuals receiving assistance under part A of title IV of the Social Security Act, homeless families and individuals, migrant or seasonal farm-workers, and elderly low-income individuals and families to enable families and individuals to:
  - 1) remove obstacles and solve problems that block the achievement of self-sufficiency (including self-sufficiency 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);
  - 2) secure and retain meaningful employment;
  - 3) attain an adequate education, with particular attention toward improving literacy skills of the low-income families in the communities involved, which may include carrying out family literacy initiatives;
  - 4) make better use of available income;
  - 5) obtain and maintain adequate housing and a suitable living environment;
  - 6) obtain emergency assistance through loans, grants or other means to meet immediate and urgent family and individual needs and
  - 7) achieve greater participation in the affairs of the communities involved, including the development of public and private grassroots partnerships with local law enforcement entities, local housing authorities, private foundations and other public and private partners to document best practices based on successful grassroots intervention in urban areas, to develop methodologies for widespread replication and strengthen and improve relationships with local law enforcement entities, which may include participation in activities such as neighborhood or community policing efforts.
- ii. To address the needs of youth in low-income communities through 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 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 after-school child care programs; and

- iii. To make more effective use of, and to coordinate with, other programs.

**COMPLIANCE:** MDHS-DCS will ensure compliance with this Assurance through its partnerships with the State's eighteen (18) eligible entities. Importantly, these partnerships and the subsequent provision of CSBG funding, allows each entity to execute their respective community action plan.

MDHS-DCS has partnered with the eligible entities to produce a Plan. The Plan is the vehicle through which the partners meet the requirement for participation in Results Oriented Management and Accountability. The Plan requires entities to identify programmatic targets related to the six national goals and to track outcomes in accordance with the national indicators.

The Plan is a comprehensive method for ensuring CSBG and related services are appropriately targeted to identify needs and that services and strategies are successful in achieving meaningful outcomes for low-income families and communities. Thus, one of the ways in which MDHS-DCS will assure compliance with the Assurance is through support of the network's adherence to the Plan.

Performance of eligible entities will be monitored and evaluated through quarterly and annual progress reports (which compare actual outcomes with anticipated outcomes), through the training and technical assistance conducted by the MDHS-DCS.

The State's client eligibility requirement will be 125% of the Federal Poverty Guidelines as determined by current federal guidelines. Live-in attendant income can be excluded if it is determined that (1) the live-in is essential to the care and well-being of the person; and (2) would not otherwise be living in the unit except to provide the necessary supportive services.

- a) Assurance 676(b)(4) – 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.

**COMPLIANCE:** MDHS-DCS will carry out this Assurance by assisting eligible entities in evaluating emergency and non-emergency nutritional needs. Such assistance will be provided through review of entity applications and community action plans as well as through regular sharing of community-based or statewide information as it is known.

The entities will be required to coordinate with local soup kitchens, food banks and also the area of direct assistance that will allow purchases of hard-to-secure supplies, nutritious foods and related services. The entities are also required to provide a copy of their emergency service plan to meet the needs of their clients.

The entities are required to partner with their local DHS Economic Assistance offices to refer client for expedited services in emergency situations. If SNAP benefits cannot be provided that same day, entities must provide assistance by giving food vouchers for emergency nutritional needs.

- b) Assurance 676(b)(5) – The State and the 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 to low-income individuals and to avoid duplication of such services, and a description of how the State and the eligible entities will coordinate the provision of employment and training activities, as defined in section 101 of such Act, in the State and in communities with entities providing activities through statewide and local workforce investment systems under the Workforce Investment Act of 1998;

**COMPLIANCE:** The development and use of effective partnerships is the intent of National Goal 4 – Partnerships among supporters and providers of services to low-income people are achieved. Through adherence to the Plan, which embraces this and the other national goals, MDHS-DCS will assure that the linkages included in the Assurance are coordinated and established.

Where entities provide employment and training services, monitoring will include an evaluation of the entities coordination of such services with entities providing activities through statewide and local workforce investment systems. Additionally, MDHS-DCS will maintain a relationship with statewide workforce investment entities and will be available to represent CSBG in those settings.

The State will require entities to coordinate and establish linkages between governmental and other social services programs to assure the maximum effectiveness in delivery and to avoid duplication. Entities must coordinate with Internal Revenue Services, a plan to assist low income families access Earn Income Tax Credit and encouraged to participate with local financial institutions in the set-up of Individual Development Accounts. The entities are requested to secure leveraging dollars which can be counted through the services provided by other entities. The entities will also be requested to provide a description of how it will coordinate with local employment services/training entities and workforce investment organizations performing under the Workforce Investment Act of 1998.

- c) Assurance 676(b)(6) – The State will ensure coordination between anti-poverty 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 communities.

**COMPLIANCE:** MDHS-DCS, through its embrace and endorsement of the Plan, actively supports coordination of anti-poverty programs within the State.

Since the Mississippi Low-Income Home Energy Assistance Program (LIHEAP) is delivered by community action entities and other organizations, and is, in fact, administered by all except one (1) entity, coordination between CSBG and LIHEAP must be intentionally planned for and achieved. Eligible entities are required, in their annual applications, to describe how they will coordinate with emergency energy crisis intervention programs at the local level. Coordination is verified during CSBG monitoring. Additionally, State-level CSBG representatives meet, periodically through the year, with State LIHEAP representatives and other entities that focus on energy needs of low-income individuals/families. The intent is to ensure appropriate coordination of effort and service.

The State ensures coordination of services between anti-poverty programs in each community through the partnerships requested from social services entities. The entities are requested to work closely with energy providers that serve their areas. The entities are requested to provide energy saving materials and Consumer Education Conservation Workshops. The entities are also requested to submit to the state a list of services and partners available to meet the needs of their clients, to include the provider's name, address, phone number and contact person.

- d) Assurance 676(b)(9) – The State and eligible entities 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.

**COMPLIANCE:** The State requires each eligible entity to establish partnerships through bilateral agreements that will address specific services to be provided by the eligible entity and the partner. Mississippi community action entities have a long history of working in partnership with a variety of groups, organizations and institutions. Many of these groups are represented on entities' boards of directors/administering board. Included are banks, chambers of commerce, child care providers, civic groups, faith-based organizations, governmental entities, health care institutions and practitioners, neighborhood

groups, schools, service providers, private foundations, professional associations and unions.

MDHS-DCS encourages the Mississippi community action entities to minimally develop and implement formal partnerships with LIHEAP and Weatherization service providers, Head Start, WIN Job Center, Community Colleges, local school districts, Area Entity on Aging, local MDHS office, primary health care centers and legal services to assure adequate access to services are made available to low-income citizens.

## **G. Fiscal Controls and Monitoring**

### **1. State Program Monitoring**

The State of Mississippi continues to utilize an established monitoring plan to ensure financial and programmatic accountability, and adherence to federal/state regulations.

The programmatic monitoring system has been designed to provide a systematic method of identifying program strengths and weaknesses, a basis for assisting entities by improving program operations and for continuing the flow of information between the entity level and DCS which is necessary for problem identification and resolution.

The State will conduct on-site monitoring visits of each entity at least once annually. Monitoring visits will normally be scheduled and confirmed at least one week prior to the visit. However, the State does reserve the right to conduct unscheduled monitoring visits. Programmatic and Fiscal Monitoring functions are performed by the Division of Program Integrity (DPI), a division within the MDHS.

An entrance conference will be conducted with the entities Executive Director or a designee to explain the purpose of the visit. Program operations of entities are reviewed by the Division of Program Integrity. These internal audits are conducted in accordance with the General Accounting Office's "Standards for Audits of Governmental Organizations, Programs, Activities, and Functions" and generally accepted auditing standards established by the American Institute of Certified Public Accountants.

A written report of the visit is prepared by DPI for the Director of DCS to review before a copy is sent to the entity. All noted findings are communicated to the entity in writing within 30 days. The entity has 30 days to respond to any deficiencies noted. Deficiencies in program operations which are not properly corrected according to instructions may result in suspension of funds or termination.

Each entity is required to contract with an independent audit firm for the purpose of auditing funds received through CSBG by using the approved process as provided

by MDHS/DCS. Entity must follow the approved procurement process for solicitation of auditors annually.

## 2. DCS Training and Technical Assistance

Mississippi adopts the belief that CSBG provides flexible core of foundational funding that enables entities to operate. Though CSBG funding may represent a small portion of entities total revenue, it is the source of an entities identity as a community action entity. All entity operations benefit from the State's community action entity designation, and subsequent CSBG funding, and the systems supporting those operations are subject to review and evaluation by the MDHS-DCS.

The state has established a plan for providing financial training and technical assistance to ensure program accountability and quality workmanship. The state anticipates at least two training sessions during program year 2015 and because of the importance of these issues, attendance will be mandatory.

The Division of Community Services (DCS) performs reviews once every two (2) years; from the reviews, DCS develops a Training and Technical Assistance (T&TA) plan specific to the needs of the agency.

Any deficiencies noted by the DCS Compliance Unit will be forwarded to DPI for resolution and/or investigation if adequate responses are not provided to DCS upon request or in a timely manner. The entity has 30 days to respond to any deficiencies noted.

The state will provide technical assistance to entities to help in the correction of deficiencies before undertaking a reduction of funding in accordance with OMB circulars A102 and A110 which also suggest technical assistance as a means of correcting deficiencies in high risk entities or a part of an action to enforce regulations.

A training and technical capacity is key to resolving monitoring and audit findings. Training and technical assistance is an ongoing approach to ensure an entity meets performing standards. Some approaches to implement capacity building efforts, include the following: annual state-wide or regional training conferences and frequent informal meetings and discussions between CSBG manager and entities' executive directors, boards and local state boards.

On-site visits provide an excellent opportunity to assess the technical needs of entities through the notation of program deficiencies. Entities are encouraged to attend all national, regional and/or state workshops. Technical assistance is provided continuously throughout the year. Each entity has access to a direct toll-free telephone line to the Division of Community Services for immediate technical

assistance from any location in the State. The State will partner with the State CAA Association to address state wide training needs.

State staff personnel are kept abreast of major changes affecting the program through attendance at state, regional and national conferences.

3. Corrective Action, Termination and Reduction of Funding

In carrying out termination and/or reduction procedures, DCS will comply in all respects with the CSBG Act.

4. Fiscal Controls, Audits and Withholding

The State of Mississippi has established fiscal controls and fund accounting procedures necessary to assure the proper disbursement of and accounting for Federal CSBG funds paid to the State, including procedures for monitoring the funds provided to entities. These controls and procedures are through an annual audit. Audits are conducted and reported in accordance with Generally Accepted Auditing Standards (GAAS), Government Auditing Standards (GAS) and Circular A-133, as applicable, and copies of the auditor's reports, and any management letters issued by the auditors, are submitted to the Division of Program Integrity (DPI) - Office of Monitoring and Division of Community Services (DCS) within nine (9) months after the end of the subgrantee's fiscal year.

DCS ensures that cost and accounting standards of the Office of Management and Budget (OMB) apply to recipients of CSBG funds by including this information in the CSBG grant award document and by reviewing annual audits prepared for each eligible entity.

- a) Assurance 676(b) (7) – The State will permit and cooperate with Federal investigations undertaken in accordance with section 678D of the Act.

**COMPLIANCE:** MDHS-DCS and the State of Mississippi will permit and fully cooperate with Federal investigations undertaken in accordance with section 678D of the Act.

- b) Assurance 676(b)(8) – 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 review by the Secretary as provided in section 678C(b);

**COMPLIANCE:** The CSBG/LIHEAP Policy Manual contains procedures governing termination or reduction of funding to eligible entities. The

procedures are in compliance with Assurance 676(b) (8). The State ensures any eligible entity that was funded in the previous year under this Act will not have its present or future funding terminated under this Act, or reduced below the proportional share of funding it received in the previous fiscal year, unless after providing notice and an opportunity for a hearing on the record, the State determines that cause existed for such termination or such reduction subject to the procedures and review by the Secretary as provided in Section 678C (b).

The same information on appeal procedures is included in the terms and provisions that are attached to each eligible entity approved subgrant agreement.

- c) Assurance 676(b) (10) – 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.

**COMPLIANCE:** The CSBG/LIHEAP Policy Manual requires each eligible entity to have established, documented procedures allowing interested organizations to petition for representation on the entities board of directors or as applicable, the administering board. Compliance is verified through monitoring conducted by MDHS-DCS.

## H. Accountability and Reporting Requirements

### 1. Results Oriented Management and Accountability

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

Through this State Plan, the Mississippi Department of Human Services-Division of Community Services (MDHS-DCS) commits to directing its CSBG resources and activities toward achieving measurable outcomes in six overarching goals. These goals represent a nationwide commitment within the community action network and they are fully embraced by Mississippi community action entities. The six goals are:

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

The Mississippi CSBG enables vital partnerships between community action entities and low-income people and communities. Community action entities create opportunities for low-income people to transcend poverty and achieve economic self-reliance.

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

MDHS-DCS ensures that CSBG resources are used by the State's community action entities to facilitate improvements in the physical, emotional, economic and social conditions in which low-income people live.

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

MDHS-DCS encourages community action entities to actively assist low-income individuals in becoming active, involved citizens.

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

MDHS-DCS actively seeks opportunities within State government to link the work of CSBG with other programs and entities focused on the needs and concerns of low-income families.

MDHS-DCS encourages statewide collaborations through its support of Head Start, Legal Services and Community Health Centers. Additionally, MDHS-DCS encourages community action entities to develop meaningful partnerships within the communities they serve. To that end, partnership data is an element within the quarterly reports required of community action entities.

Goal 5 Entities increase their capacity to achieve results.

MDHS-DCS is supportive of entities' on-going development of the capacities that lead to positive results for low-income people and communities. MDHS-DCS provides training and technical assistance and it partners with other entities to strengthen individual entities and the statewide CSBG network. Discretionary funds are used for capacity-building activities within individual entities and across the network.

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

MDHS-DCS supports community action entities as they work within their communities to develop and provide service systems that are supportive of vulnerable populations.

Through analysis of progress toward these six goals, MDHS-DCS measures its success in meeting the intent and purposes of the CSBG Act.

**COMPLIANCE:** As of October 1, 2001, Mississippi was in compliance with requirements for outcomes measurement and reporting. Mississippi has fully embraced Results Oriented Management and Accountability (ROMA). In Program Year 2005, MDHS-DCS; the eligible entities were mandated to utilize the revised case management approach as a blueprint for service delivery along with the ROMA compliant reporting format. Subsequently, a single plan for data collection was deployed state-wide. The data is regularly reviewed by its user group. Best practice is shared and suggestions for improvement, to the network's data collection efforts, are always being reviewed. DCS's commitment to ROMA and its monitoring procedures ensure that the State of Mississippi's CSBG-eligible entities continue their compliance with this Assurance.

2. Annual Report

The Mississippi CSBG Program must submit an annual report to OCS in the form of the annual NASCSP CSBG Information System Report. The most recent CSBG IS Report was submitted in March, 2014. The next CSBG IS Report will be submitted by the end of March, 2015.

3. Organizational Standards

The State of Mississippi has adopted the draft CSBG Organizational Standards developed by the Center of Excellence. These standards will be used to assess and monitor eligible entities to assure the level of accountability to promote quality among Mississippi's eligible entities.

The State, in conjunction with the State CAA Association, has received training and assistance from the RPIC lead state, Georgia, regarding the standards. Eligible entities were notified of the State's intent to implement the standards at the public hearing and given the opportunity to comment. The State has required the eligible entities to conduct an internal assessment using the standards, and will provide T&TA in the areas of deficiency.

The State has incorporated the standards in its T&TA document for desk reviews and field reviews. We are meeting with the Division of Program Integrity to modify the monitoring tool to incorporate the standards. Board of Director training is being scheduled for this year, and the state will work with them to incorporate the standards into their bylaws and operational procedures. Eligible entities will be monitored on the standards beginning program year 2015 which begins January 1, 2015. Our goal is to meet at least 75% of the standards for 2015, and 100% for 2016.

# **APPENDIX A**

## **Letter of Designation**



**PHIL BRYANT**  
GOVERNOR

May 7, 2013

Ms. Jeannie Chaffin, Director  
Office of Community Services  
Administration for Children and Families  
U. S. Department of Health and Human Services  
370 L'Enfant Promenade, S. W., 5<sup>th</sup> Floor, West  
Washington, D. C. 20447

Dear Ms. Chaffin:

I hereby authorize Mr. Richard A. Berry, Executive Director of the Mississippi Department of Human Services (MDHS), to be the official signature authority for all funds appropriated to MDHS by the U. S. Department of Health and Human Services. In addition, I authorize Mr. Berry to sign all assurances for the Community Service Block Grant and Low-Income Home Energy Assistance Program (LIHEAP) grant applications outlined in the respective statute, as amended. To comply with the LIHEAP statute, Mr. Berry is duly authorized to certify that MDHS will comply with the 16 assurances contained in the LIHEAP Act, Title XXVI of the Omnibus Budget Reconciliation Act of 1981 as amended, in the administration and operation of its Low-Income Home Energy Assistance Program.

The Director of the Division of Community Services, Ms. Tina Ruffin, will serve as the state liaison for the implementation of the Community Services Block Grant and the Low-Income Home Energy Assistance Programs. All routine correspondence from your office should be directed to Ms. Ruffin and you may contact her directly at P. O. Box 352, Jackson, Mississippi 39205 or telephone (601) 359-4768.

Sincerely,

A handwritten signature in black ink that reads "Phil Bryant".

Phil Bryant

PB:RAB:tr

cc: Richard A. Berry, Executive Director  
Mississippi Department of Human Services

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# **APPENDIX B**

## **Administrative Certifications**

**Certification Regarding Lobbying  
Department of Health and Human Services**

**Administration for Children and Families**

**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 any entity, 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 entity, 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.

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 and officer or employee of an 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.

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Richard A. Berry, Executive Director  
Mississippi Department of Human Services

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Date

## **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. If necessary, the prospective participant shall submit an explanation of why it cannot provide the certification. The certification or explanation will be considered in connection with the Department of Health and Human Services' (HHS) determination whether to enter into this transaction. However, failure of the prospective primary participant to furnish a certification or 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 HHS determined that the prospective primary participant knowingly rendered an erroneous certification in addition to other remedies available to the Federal Government, HHS may terminate this transaction for cause or default.
4. The prospective primary participant shall provide immediate written notice to the HHS entity 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: 45 CFR Part 76. See the attached definitions.
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 debarred, suspended, declared ineligible, or voluntarily excluded from participation in this covered transaction, unless authorized by HHS.
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 Exclusion - Lower Tier Covered Transactions," provided by HHS, without modification, in all lower tier covered transactions and in all solicitations for lower tier covered transactions.
8. A participant in a covered transaction may rely upon a certification of a prospective participant in a lower tier covered transaction that it is not 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 Non-procurement List (of excluded parties).
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 suspended, debarred, ineligible, or voluntarily excluded from participation in this transaction, in addition to other remedies available to the Federal Government, HHS 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 from covered transactions by any Federal department or entity;
  - (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 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 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.

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Richard A. Berry, Executive Director  
Mississippi Department of Human Services

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Date

## **CERTIFICATION REGARDING DRUG-FREE WORKPLACE REQUIREMENTS**

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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.

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### 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 not 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 Non-procurement 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 ten calendar days after receiving notice under paragraph (d)(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;
  - (f) Taking one of the following actions, within 30 calendar days of receiving notice under paragraph (d)(2), with respect to any employee who is so convicted –
    - (1) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
    - (2) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;
  - (g) Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs (a), (b), (c), (d), (e) and (f).
- (B) The grantee may insert in the space provided below the site(s) for the performance of work done in connection with the specific grant:

Place of Performance (Street address, city, county, state, zip code)

**750 North State Street**

**Jackson, MS 39202 (Hinds County)**

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]

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Richard A. Berry, Executive Director  
Mississippi Department of Human Services

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Date

## ENVIRONMENTAL TOBACCO SMOKE CERTIFICATION

Public Law 103-227, Part C, Environmental Tobacco Smoke, also known as the Pro-Children Act of 1994 (Act), requires that smoking not be permitted in any portion of any indoor facility owned or leased or contracted for by an entity and used routinely or regularly for the provision of health, day care, education, or library services to children under the age of 18 or if the services are funded by Federal programs either directly or through States 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 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.

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Richard A. Berry, Executive Director  
Mississippi Department of Human Services

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Date

# **APPENDIX C**

## **Annual Audit**



RECEIVED

MAR 14 2014

DEPUTY ADMINISTRATOR

**STATE OF MISSISSIPPI  
OFFICE OF THE STATE AUDITOR  
STACEY E. PICKERING  
AUDITOR**

March 10, 2014

**Single Audit Management Report**

Richard Berry, Executive Director  
Mississippi Department of Human Services  
P. O. Box 352  
Jackson, MS 39205

Dear Mr. Berry:

Enclosed for your review are the single audit findings and other audit findings for the Mississippi Department of Human Services for Fiscal Year 2013. In these findings, the Auditor's Office recommends the Mississippi Department of Human Services:

Single Audit Findings:

1. Strengthen controls over compliance with allowable costs requirements of the CCDF Cluster;
2. Strengthen controls over compliance with eligibility and benefit payment requirements of the TANF Program;
3. Strengthen controls to ensure compliance with eligibility requirements of the CCDF Cluster;
4. Strengthen controls over compliance with Federal Funding Accountability and Transparency Act (FFATA) Reporting for the SSBG Program;
5. Ensure on-site monitoring for the CCDF Cluster is properly performed;
6. Strengthen controls over reporting of subawards for FFATA requirement for the TANF Program and CCDF Cluster;
7. Strengthen controls over on-site monitoring;
8. Strengthen controls over subrecipient monitoring for OMB Circular A-133 audits;

Other Audit Findings:

9. Strengthen controls over 20 percent exemption and five-year time limit for the TANF Program;
10. Strengthen controls over termination of benefits for non-participation of work-eligible adults in the work activities program of the TANF Program;
11. Strengthen controls for the review of employee approval levels in the Statewide Automated Accounting System (SAAS); and
12. Strengthen controls over the data collection and submission of required federal reporting elements and report for the TANF Program.

Please review the recommendations and submit a plan to implement them by March 21, 2014. The enclosed findings contain more information about our recommendations.

POST OFFICE BOX 956 • JACKSON, MISSISSIPPI 39205 • (601) 576-2800 • FAX (601) 576-2650

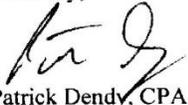
Mississippi Department of Human Services  
March 10, 2014  
Page 2

During future engagements, we may review the findings in this management report to ensure procedures have been initiated to address these findings.

The purpose of this report on internal control over compliance is solely to describe the scope of our testing of internal control over compliance and the results of that testing based on the requirements of OMB Circular A-133. Accordingly, this report is not suitable for any other purpose. However, this report is a matter of public record and its distribution is not limited. The Office of the State Auditor has also issued an Information Systems Management Report on the Mississippi Department of Human Services dated March 10, 2014. That report should be read in conjunction with this report.

I hope you find our recommendations enable the Mississippi Department of Human Services to carry out its mission more efficiently. I appreciate the cooperation and courtesy extended by the officials and employees of the Mississippi Department of Human Services throughout the audit. If you have any questions or need more information, please contact me.

Sincerely,



Patrick Dendy, CPA  
Director, Department of Audit

Enclosures

# **APPENDIX D**

## **List of Eligible Entities**

**MISSISSIPPI DEPARTMENT OF HUMAN SERVICES  
COMMUNITY ACTION ENTITIES  
FOR CSBG**

**AJFC**

**Chief Executive Officer, Sandra Sewell  
P.O. Box 3011  
1038 N. Union, Bldg. A.  
Natchez, MS 39120  
(601) 442-8681 or 1-866-243-0041**

Adams	(601) 442-8681	Claiborne	(601) 437-5419
Copiah	(601) 894-4745	Franklin	(601) 384-5587
Jefferson	(601) 786-3711	Lawrence	(601) 587-4370
Lincoln	(601) 833-6349		

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**Bolivar County**

**Executive Director, Elnora Littleton  
810 East Sunflower Road  
Suite 120  
Cleveland, MS 38732  
(662) 846-1491 or 1-800-743-2901**

Bolivar (662) 846-1491

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**Central Mississippi, Inc.**

**Executive Director, Pamela Gary  
101 South Central Ave.  
Winona, MS 38967  
(662) 283-4781 or 1-800-898-0410**

Attala	(662) 289-5934	Carroll	(662) 464-5667
Grenada	(662) 226-7953	Holmes	(662) 834-2437
Leflore	(662) 455-3497	Montgomery	(662) 283-2698
Yalobusha	(662) 226-7953		

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**Coahoma Opportunities, Inc.**

**Executive Director, Edward Seals  
115 Issaquena Ave.  
Clarksdale, MS 38614  
(662) 624-4887**

Coahoma (662) 624-4887

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**Gulf Coast Community Action Agency**  
**Executive Director, Dr. Barbara Coatney**  
**500 24<sup>th</sup> Street**  
**Gulfport, MS 39502**  
**(228) 896-1409 or 1-888-603-4222**

George	(601) 947-7426	Greene	(601) 394-2942
Hancock	(228) 896-1409	Harrison	(228) 896-1409
Stone	(228) 896-1409		

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**Hinds County Human Resource Agency**  
**President/CEO, Kenn Cockrell**  
**258 Maddox Road**  
**Jackson, MS 39212**  
**(601) 923-3930 or (601) 923-3950**

Hinds (601) 923-3950

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**Jackson County CAC**  
**Executive Director, Diann Payne**  
**5343 Jefferson Street**  
**Moss Point, MS 39562**  
**(228) 769-3292**

Jackson (228) 769-3292

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**LIFT, Incorporated**  
**Executive Director, Dorothy Leasy**  
**2577 McCullough Blvd.**  
**Belden, MS 38826**  
**(662) 842-9511 or 1-800-844-5435**

Calhoun	(662) 412-2222	Chickasaw	(662) 447-2089
Itawamba	(662) 862-4894	Lafayette	(662) 234-4568
Lee	(662) 842-9511	Monroe	(662) 369-4695
Pontotoc	(662) 489-7329	Union	(662) 534-8104

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**Mid-State Opportunity CAA**  
**Executive Director, Helen Bell**  
**204 North Church Street**  
**Charleston, MS 38921**  
**(662) 647-2463 or 1-800-523-6683**

Desoto	(662) 895-4153	Panola	(662) 487-3076
Quitman	(662) 326-8131	Tallahatchie	(662) 647-2463
Tate	(662) 562-7733	Tunica	(662) 363-2751

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**Multi-County CSA**  
**Interim Executive Director, Angela Hicks**  
2906 St. Paul Street  
Meridian, MS 39302  
**(601) 483-4838 or 1-800-898-0659**

Clarke	(601) 776-3461	Jasper	(601) 784-4844
Kemper	(601) 743-5752	Lauderdale	(601) 482-9887
Neshoba	(601) 656-7261	Newton	(601) 683-2733
Scott	(601) 469-3061	Smith	(601) 782-9578
Wayne	(601) 735-3470		

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**Northeast MS CS**  
**Executive Director, Steve Gaines**  
801 Hatchie Street  
Booneville, MS 38829  
**(662) 728-2118 or 1-877-728-2118**

Alcorn	(662) 286-9263	Marshall	(662) 252-2713
Prentiss	(662) 728-2118	Tishomingo	(662) 423-7013

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**PRVO**  
**Executive Director, Helmon Johnson**  
756 Highway 98 Bypass  
Columbia, MS 39429  
**(601) 736-6077 or 1-866-736-9564**

Covington	(601) 765-4871	Forrest	(601) 544-1394
Jefferson Davis	(601) 792-5356	Jones	(601) 428-3171
Lamar	(601) 794-8387	Marion	(601) 736-6077
Pearl River	(601) 749-7729	Pearl River	(601) 403-2206
Perry	(601) 964-8231		

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**Prairie Opportunity**  
**Executive Director, Laura Marshall**  
501 Hwy. 12 West  
Suite 110  
Starkville, MS 39759  
**(662) 323-3397 or 1-888-397-5550**

Choctaw	(662) 285-6291	Clay	(662) 494-4862
Leake	(601) 267-4510	Lowndes	(662) 328-1669
Noxubee	(662) 726-4861	Oktibbeha	(662) 323-3397
Webster	(662) 258-8233	Winston	(662) 773-3465

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**South Central Community Action Agency**  
**Executive Director, Sheletta Buckley**  
**P.O. Box 129**  
**110 Fourth Street**  
**D'Lo, MS 39062**  
**(601) 847-5552 or 1-866-313-2905**

Madison	(601) 407-5473	Rankin	(601) 824-8844
Simpson	(601) 847-5552		

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**Southwest Mississippi Opportunities**  
**Executive Director, Bill Franklin**  
**P.O. Box 1667**  
**223 3<sup>rd</sup> Street**  
**McComb, MS 39648**  
**(601) 684-5593 or 1-800-250-7730**

Amite	(601) 225-7878	Pike	(601) 684-5593
Walthall	(601) 876-4511	Wilkinson	(601) 888-4211

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**Sunflower-Humphreys Counties Progress**  
**Chief Executive Officer, Louise Lloyd**  
**414 Martin Luther King Dr.**  
**Indianola, MS 38751**  
**(662) 887-5659 or 1-888-677-1461**

Humphreys	(662) 247-1961	Sunflower	(662) 887-5659
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**United CAA**  
**Executive Director, Willie Ruth Daugherty**  
**380 Ripley Avenue**  
**Ashland, MS 38603**  
**(662) 224-8912 or 1-888-744-4407**

Benton	(662) 224-8912	Tippah	(662) 837-9812
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**WWISCAA**  
**Executive Director, Jannis Williams**  
**P.O. Box 1813**  
**1165 South Raceway Road**  
**Greenville, MS 38701**  
**(662) 378-8663 or 1-800-820-8204**

Issaquena	(662) 873-2595	Sharkey	(662) 873-2595
Warren	(601) 638-2474	Washington	(662) 378-8663
Yazoo	(662)746-1517		

# **APPENDIX E**

## **Tentative FY 2015 Allocations of Eligible Entities**

<b>2015 CSBG Tentative Allocations- June 2014</b>			
<b>(based on 2014 final allocations)</b>			
			Total
			Allocation
<b>AJFC</b>			
	Adams	1.44%	137,028
	Claiborne	0.62%	58,998
	Copiah	1.10%	104,674
	Franklin	0.32%	30,451
	Jefferson	0.45%	42,821
	Lawrence	0.43%	40,918
	Lincoln	1.14%	108,480
	Total	5.50%	523,369
<b>BOLIVAR</b>			
	Bolivar	2.25%	214,106
<b>CENTRAL MS</b>			
	Attala	0.75%	71,369
	Carroll	0.38%	36,160
	Grenada	0.89%	84,691
	Holmes	1.39%	132,270
	Leflore	2.33%	221,718
	Montgomery	0.50%	47,579
	Yalobusha	0.62%	58,998
	Total	6.86%	652,784
<b>COAHOMA</b>			
	Coahoma	1.60%	152,253

<b>2015 CSBG Tentative Allocations- June 2014</b>			
<b>(based on 2014 final allocations)</b>			
			Total
			Allocation
<b>GULF COAST</b>			
	George	0.44%	41,870
	Greene	0.34%	32,354
	Hancock	0.96%	91,352
	Harrison	4.31%	410,131
	Stone	0.40%	38,063
	Total	6.45%	613,769
<b>HINDS COUNTY</b>			
	Hinds	8.92%	848,810
<b>JACKSON COUNTY</b>			
	Jackson	3.20%	304,506
<b>LIFT</b>			
	Calhoun	0.51%	48,531
	Chickasaw	0.77%	73,272
	Itawamba	0.53%	50,434
	Lafayette	1.54%	146,543
	Lee	2.50%	237,895
	Monroe	1.25%	118,948
	Pontotoc	0.77%	73,272
	Union	0.79%	75,175
	Total	8.66%	824,069
<b>MID-STATE</b>			
	Desoto	2.30%	218,864
	Panola	1.65%	157,011
	Quitman	0.48%	45,676
	Tallahatchie	0.68%	64,707
	Tate	0.75%	71,369
	Tunica	0.50%	47,579
	Total	6.36%	605,205

<b>2015 CSBG Tentative Allocations- June 2014</b>			
<b>(based on 2014 final allocations)</b>			
			Total
			Allocation
<b>MULTI-COUNTY</b>			
	Clarke	0.62%	58,998
	Jasper	0.64%	60,901
	Kemper	0.37%	35,208
	Lauderdale	2.68%	255,024
	Newton	0.64%	60,901
	Wayne	0.79%	75,175
	EC- Neshoba	1.05%	99,916
	EC-Scott	1.17%	111,335
	EC-Smith	0.49%	46,627
	Total	8.45%	804,086
<b>NORTHEAST MS</b>			
	Alcorn	0.99%	94,206
	Marshall	1.29%	122,754
	Prentiss	0.89%	84,691
	Tishomingo	0.69%	65,659
	Total	3.86%	367,310
<b>PRVO</b>			
	Covington	0.86%	81,836
	Forrest	3.20%	304,506
	Jeff Davis	0.59%	56,143
	Jones	2.60%	247,411
	Lamar	1.07%	101,819
	Marion	1.06%	100,868
	Pearl River	1.95%	185,558
	Perry	0.44%	41,870
	Total	11.77%	1,120,010

<b>2015 CSBG Tentative Allocations- June 2014</b>			
<b>(based on 2014 final allocations)</b>			
			Total
			Allocation
<b>PRAIRIE OPPORTUNITY</b>			
	Choctaw	0.34%	32,354
	Clay	0.82%	78,030
	Lowndes	1.99%	189,365
	Noxubee	0.63%	59,950
	Oktibbeha	2.27%	216,009
	Webster	0.41%	39,015
	Winston	0.68%	64,707
	EC- Leake	0.71%	67,562
	Total	7.85%	746,991
<b>SOUTH CENTRAL CAA</b>			
	Simpson	1.06%	100,868
	Madison	2.03%	193,171
	Rankin	2.17%	206,493
	Total	5.26%	500,531
<b>SOUTHWEST MS</b>			
	Amite	0.59%	56,143
	Pike	1.75%	166,527
	Walthall	0.58%	55,192
	Wilkinson	0.45%	42,821
	Total	3.37%	320,683
<b>SUNFLOWER-HUMPHREYS</b>			
	Humphreys	0.64%	60,901
	Sunflower	1.52%	144,640
	Total	2.16%	205,541

<b>2015 CSBG Tentative Allocations- June 2014</b>			
<b>(based on 2014 final allocations)</b>			
			Total
			Allocation
<b>UNITED</b>			
	Benton	0.36%	34,257
	Tippah	0.83%	78,981
	Total	1.19%	113,238
<b>WWISCAA</b>			
	Issaquena	0.14%	13,322
	Sharkey	0.29%	27,596
	Warren	1.52%	144,640
	Washington	3.03%	288,329
	Yazoo	1.32%	125,609
	Total	6.30%	599,496

# **APPENDIX F**

## **Map of Areas Served**



# **APPENDIX G**

## **FY 2014 CSNA Results**

## **Community Strength and Needs Assessment Statewide Results**

The Mississippi Department of Human Services (MDHS) Division of Community Services (DCS) is dedicated to helping low-income individuals meet various needs. The MDHS DCS secured a Community Strengths and Needs Assessment (CSNA) from each eligible entity within the State. The CSNAs are the basis for the ranking of services stated in the Community Action Agency/Human Resource Agency's community action plan and their budget request. The CSNA was conducted in each county served. Participation from citizens in all aspects of the community, public, private, and the poor sector were asked to complete a survey. The CSNA was also shared with partners, other entities and other programs administered by the agencies. Some of the methods used to conduct the CSNAs were: mail survey, personal interviews and community meetings.

The needs assessment asks individuals general information such as:

- gender,
- race
- educational level
- major source of income
- family size
- number of children under the age 5 in the household
- number of disabled children in household
- number of elderly in the household age 60 and over

Participants completing the needs assessment were asked to rank in order from one to nine with one being the most important; the services they felt were most needed in their area. Those services included: employment, education, emergency, health and safety, nutrition, housing, child care, transportation and income management.

Once the agencies submitted their FY 2014 subgrants to the MDHS-DCS, the results from each CAA/HRA were compiled and reviewed. The top three rankings for the State of Mississippi indicated that employment was the greatest need, Education and Housing tied for second and transportation was the third. During the Annual DCS Implementation workshop, a session was held to address the results of the CSNAs. CAAs/HRAs were encouraged to coordinate services and to establish partnerships to assist clients with finding sustainable employment, helping them obtain a GED or continuing their education by getting a degree or trade, assisting the client in obtaining decent and affordable housing, and lastly helping clients secure reliable transportation.

We have and will continually work with our agencies to eliminate barriers so that the client can become self-sufficient. We strongly encourage partnerships to assist in helping those clients within the State of Mississippi.

# **APPENDIX H**

## **Legislative Public Hearing**

LEGAL GRANTS  
(Block Grants)  
MISSISSIPPI DEPARTMENT OF  
HUMAN SERVICES  
Division of Community Services  
Legislative Public Hearing

The Mississippi Department of Human Services, Division of Community Services will be conducting the Legislative Public Hearing on the Community Services Block Grant and Low-Income Home Energy Assistance Programs under Title 26 of the Omnibus Budget Reconciliation Act of 1981, as amended. The hearing for the 2015 programs is scheduled for Tuesday, June 10, 2014, at 10:00 a.m. at the Mississippi State Capitol, 400 High Street, Room 113, Jackson, Mississippi.

The Community Services Block Grant provides funds for a range of activities to ameliorate the causes and effects of poverty. For Fiscal Year 2015, at least 90 percent of the funds allocated to the State through these grants will be contracted to non-profit community action agencies, migrant seasonal farm worker organizations or community-based organizations that meet the eligibility requirements as described in Section 675 of the Community Services Block Grant Act, as amended. The eligibility requirements for the program are outlined in the application process.

The Low-Income Home Energy Assistance Program assists eligible households to pay the costs of home energy bills and other energy-related services, for example, wood, kerosene, electricity, gas, heaters, blankets, fans and air conditioners. For Fiscal Year 2015, at least 90 percent of the funds allocated to the State through these grants will be contracted to private, nonprofit, and public agencies designated in accordance with Public Law 97-35, as amended. The eligibility requirements for the program are outlined in the application process.

Copies of the state plans are available for review at the Mississippi Department of Human Services by calling 601-359-4768 or 1-800-421-0762.

Inquiries, comments or suggestions regarding the block grant plan and/or eligibility requirements must be received on or before June 13, 2014 by the Division of Community Services, P. O. Box 352, Jackson, Mississippi 39205. Public comments will be reviewed before finalizing the 2015 State Plans for these programs.

**MISSISSIPPI DEPARTMENT OF HUMAN SERVICES  
DIVISION OF COMMUNITY SERVICES**

**MEMORANDUM**

TO: Denise Williams  
Department of Purchasing

FROM: Nicole McBeath  
Division of Community Services

DATE: April 25, 2014

SUBJECT: Publication of Legal Notice

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The Division of Community Services requests that a legal notice concerning the Legislative Public Hearing on the Community Services Block Grant and Low-Income Home Energy Assistance Programs be published in the classified section of the twelve newspapers listed (See attachment). The information should be advertised on May 27, 2014 and June 3, 2014 and should appear one time in each newspaper. Please send us the copies of the newspaper advertisements from **three** different publishers as soon as they are announced.

Should you have any questions, please contact Nicole McBeath at 9-4765.

TMR:nm

Attachments

Mississippi Department of Human Services  
Division of Community Services

**NEWSPAPERS**

- |     |   |     |   |
|-----|---|-----|---|
| 13. | <b>The Jackson Advocate</b><br>115 East Hamilton<br>Jackson, MS 39202           | 19. | <b>The Clarion Ledger</b><br>Post Office Box 40<br>Jackson, MS 39205-0040             |
| 14. | <b>The Natchez Democrat</b><br>Post Office Box 1447<br>Natchez, MS 39121-39221  | 20. | <b>The Vicksburg Evening Post</b><br>Post Office Box 951<br>Vicksburg, MS 39180       |
| 15. | <b>The Commercial Dispatch</b><br>Post Office Box 511<br>Columbus, MS 39703     | 21. | <b>The Northeast MS Daily Journal</b><br>Post Office Box 909<br>Tupelo, MS 38801      |
| 16. | <b>The Delta Democrat Times</b><br>Post Office Box 1618<br>Greenville, MS 38701 | 22. | <b>The Hattiesburg American</b><br>Post Office Box 1111<br>Hattiesburg, MS 39401      |
| 17. | <b>The Daily Corinthian</b><br>Post Office Box 119<br>Corinth, MS 38834         | 23. | <b>The Clarksdale Press Registrar</b><br>Post Office Box 1119<br>Clarksdale, MS 38614 |
| 18. | <b>The Gulf Publishing Company</b><br>Post Office Box 4567<br>Biloxi, MS 39535  | 24. | <b>The Meridian Star</b><br>Post Office Box 1591<br>Meridian, MS 39301                |

**MISSISSIPPI DEPARTMENT OF HUMAN SERVICES  
DIVISION OF COMMUNITY SERVICES**

**AGENDA**

**2015 COMMUNITY SERVICES BLOCK GRANT (CSBG)  
AND  
2015 LOW-INCOME HOME ENERGY ASSISTANCE PROGRAM (LIHEAP)**

**LEGISLATIVE PUBLIC HEARING**

**Tuesday, June 10, 2014, at 10:00 a.m.**

**MISSISSIPPI STATE CAPITOL  
400 HIGH STREET  
ROOM 113,  
JACKSON, MISSISSIPPI**

- I. Opening Remarks and Introduction
- II. Purpose of Hearing
- III. Presentation of FY 2015 State Plan
  - LIHEAP
  - CSBG
- IV. Public Comments
- V. Closing Remarks

## PUBLIC COMMENTS FROM THE 2015 LEGISLATIVE PUBLIC HEARING

### Multi-County Community Service Agency

Will the new Mississippi Accountability System for Government Information and Collaboration (MAGIC) allow attachments to be uploaded?

### AJFC Community Action Agency

What is the set date MAGIC will affect the agencies?

### Hinds County Human Resource Agency

- VIII. In section I. CSBG State Plan Narrative, Part B. Criteria and Formula for the Distribution of CSBG Funds (Page 14), It states: The State will contract with eligible entities during Program Year 2015, beginning January 1, 2015 through December 31, 2015. Funds are obligated effective January 1 in accordance with MDHS Sub grantee Manual.

Allocable FFY 2015 Mississippi CSBG funds will be distributed on a formula basis, based on the percentage (latest Census data) of the poor population in a county compared to the statewide percentage (pending Federal allocation to the State of Mississippi). The CSBG sub grant allocations will use the following factors:

4. Twenty-five (25) percent of each eligible entities allocation must be allocated to the Supportive Services activity for direct client services.
5. Fifteen (15) percent of each eligible entities allocation may be used for the Administrative activity.
6. Sixty (60) percent of each eligible entities allocation may be used for the Case Management activity.

*It is not understood why this section is needed and how is it valid under the CSBG Act. This takes away the creative ability of agencies if we are forcing them to use a certain percentage to “supportive services” and “case management”. Since 2001 – Information Memorandum (IM) 49 is the public policy document that sets ROMA within the context of compliance under GPRA, and provides guidance for both state CSBG agencies and the CAAs for managing client activities and reporting results. The framework for achieving outcomes includes a full range management and accountability activities as depicted by the ROMA Cycle. If CSBG agencies are to form results oriented plans based on their comprehensive community needs assessment, they should reserve the right to conduct activities that may be at the family, community or agency level and not specifically required to perform only family level services. If any CSBG entity chooses to use all*

partnerships and sub grant all of its CSBG funding to community development and they have the needs assessment research to back up this board decision, then they reserve that right under the CSBG Act and subsequent Information Memorandums.

- IX. In section I. CSBG State Plan Narrative, Part D, Description of Distribution and Use of Discretionary Funds - 676(b) (2), It states: MDHS-DCS will allocate at least 5 percent of CSBG funds received by the State for FFY 2015 to support discretionary projects related to the purposes of the CSBG Act and the six national goals.

A percentage of discretionary funds are allocated based on the following activities:

4. Capacity building- 57%: to include T&TA, IT needs for the Virtual ROMA system, staff training and ACH;
5. Corrective Action- 8%: to include partnerships with the state CAA association to assist CAAs with corrective action strategies and;
6. Other CSBG purposes- 35%: to include new and existing community projects for seniors and youth.

Section 1 equals to \$286, 636.47 for services that have not been an impact as much as the ability to create new projects. Does this cover a separate T&TA staff salary outside of the Administration 5% and an IT contract for Virtual ROMA? Section 3 is \$176,004.85 and there are not any measureable criteria for "other CSBG purposes."

- X. In section I. CSBG State Plan Narrative, Part F. State Community Services Program Implementation - 676(b) (3) Section 2 .Community Strength and Needs Assessments

In accordance with the assurance in 676(b)(11) of the Act, MDHS-DCS will secure from each eligible entity in the State, as part of its annual application and as a condition of a financial award, a community action plan which will provide a description of the Community Strengths and Needs Assessment (CSNA) for the community served. The CSNA must be conducted in each county served including citizens from all aspects of the community, public, private, and the poor sector. The CSNA may also include partners, other entities and other programs administered by the entity. The CSNAs are the basis for the ranking of services stated in the community action plan and the budget request.

The community action plan must provide a description of the following:

- j) A description of the comprehensive CSNA to determine the services to be provided based on eligible activities;
- k) A description of outcome measures to be used to monitor success in promoting self-reliance, family stability, and community revitalization.
- l) The entity must state goals and objectives in measurable terms and projected in a quarterly timetable, which indicates when the stated goals and objectives

will be accomplished. The strategies employed to achieve the objectives must be adequately described and quantified. This information will also be used in conjunction with Virtual ROMA the Management Information System to measure plan-versus-actual performance levels.

*When stating objectives, does the state plan imply outcomes? Can Virtual ROMA complete the measure of section iii?*

XI. Under Part 4. Earned Income Tax Credit (EITC) Project, it states: All eligible entities must provide a plan for EITC and describe how it will be incorporated into case management for clients. What if a needs assessment and agency plan doesn't call for the agency to provide EITC or case management? This is a large assumption that an agency should automatically keep the service format set forth by the state.

XII. Under the Federal Assurance 676(b)(4), it states: 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.

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*The state plane suggest: COMPLIANCE: MDHS-DCS will carry out this Assurance by assisting eligible entities in evaluating emergency and non-emergency nutritional needs. Such assistance will be provided through review of entity applications and community action plans as well as through regular sharing of community-based or statewide information as it is known.*

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The entities will be required to coordinate with local soup kitchens, food banks and also the area of direct assistance that will allow purchases of hard-to-secure supplies, nutritious foods and related services. The entities are also required to provide a copy of their emergency service plan to meet the needs of their clients.

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The entities are required to partner with their local DHS Economic Assistance offices to refer client for expedited services in emergency situations. If SNAP benefits cannot be provided that same day, entities must provide assistance by giving food vouchers for emergency nutritional needs.

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*This specifically stating that we give food vouchers and "required to coordinate to work with local soup kitchens" is not what this federal assurance requires.*

XIII. In regards to Organizational Standards. The state plan suggests; Effective FFY 2015 MDHS-DCS will implement organizational standards in eligible entities sub grants. It is the goal of the state and eligible entities to meet 75% of the organizational performance standards in FFY 2015 and meet 75% of the standards for FFY 2015 and 100% for FFY 2016. The state will provide necessary T&TA to eligible entities to meet standards. Also,

the state will seek and participate in Federal Training and training provided by outside consultants to meet the organizational standards.

HCHRA suggest that 100% of anything is setting unrealistic standards rather there should be a scale set to allow for fluid change that occurs through development.

XIV. Appendix J: CSBG Outcome Indicators pages 91-9. These need to be corrected to include logic model development and not included in the state plan. They should use correct ROMA practices by establishing documentation of movement from one outcome on a scale to another as opposed to just placement on scale.

# **APPENDIX I**

## **Fair Hearing Process**

**FAIR HEARING PROCESS  
CLIENT LEVEL**

**Client Rights**

A client must be apprised of his/her right to a fair hearing at the time the application is made. Each entity has established a set of procedures which explicitly detail the proper local channels, with the appropriate time frames a client should follow, in his/her request for a fair hearing.

All appeals must be routed through the Division of Community Services.

**Step I**

After having exhausted all channels of resolution at the local level, the complainant has five (5) working days to submit an appeal to:

Director  
Division of Community Services  
Mississippi Department of Human Services  
Post Office Box 352  
Jackson, Mississippi 39205

This appeal must include, but not limited to, the following:

7. Name and address of complainant.
8. Name of entity in dispute.
9. Date of denial notification.
10. Reason for denial.
11. Justification noting why service(s) should be rendered.
12. Two (2) signed and dated copies of the appeal (an original and one copy).

The Director of the Division of Community Services shall have a period of ten (10) working days to research the matter, conduct a hearing, and render a written decision. If this decision is not satisfactory, the complainant may proceed with Step II.

**Step II**

The complainant shall have five (5) working days after receiving a decision in Step I to file an appeal with:

Executive Director  
Mississippi Department of Human Services  
Post Office Box 352  
Jackson, Mississippi 39205

The procedures for filing such a complaint are the same as those listed in numbers 1-6 of Step I. The Executive Director of the Mississippi Department of Human Services shall have fifteen (15) working days to research the matter, conduct a hearing, and render a decision. Should the complainant deem this decision to be unsatisfactory, he/she may proceed to Step III.

### **Step III**

If the complainant is dissatisfied with the decision rendered by the Executive Director of the Mississippi Department of Human Services, the complainant shall have five (5) working days after receiving a written decision in Step II to file a complaint with the Secretary of the U.S. Department of Health and Human Services. The procedures for filing such a complaint are the same as those listed in Steps I and II. The complaint shall be filed with:

Secretary  
U.S. Department of Health and Human Services  
Office of Community Services  
370 L'Enfant Promenade, S.W., 5<sup>th</sup> Floor  
Washington, DC 20447

At this point the time frame for a response shall be determined solely by the Secretary of the U.S. Department of Health and Human Services. The Secretary's decision is final and binding.

**FAIR HEARING PROCESS  
ENTITY LEVEL**

**TERMINATION AND/OR SUSPENSION OF COMMUNITY ACTION ENTITIES**

The State shall notify, in writing, any community action entity which received funding under the Community Services Block Grant that a hearing on the proposed termination or suspension of such a community action entity, as result of alleged subgrant violation(s), State and/or Federal non-compliance, will be held. The procedures for such hearing are stated below.

D. Hearing notices will be directed from:

Executive Director  
Mississippi Department of Human Services  
Post Office Box 352  
Jackson, Mississippi 39205

E. The notice will include, but not limited to, the following:

1. Name and address of the community action entity whose grant is to be terminated or suspended.
2. Date and location of hearing.
3. Reason(s) for hearing, that is, the alleged violations which are to result in termination or suspension.

F. The Executive Director shall have a period of ten (10) working days after the hearing to render a decision, notify the entity, and forwarded all evidence and its conclusion to the Secretary of the U.S. Department of Health and Human Services for final review and determination.

**NOTE:** This procedure does not preclude or otherwise limit an eligible entity from seeking review and/or other remedy through the courts.

# **APPENDIX J**

## **ADDITIONAL DCS POLICIES**

## **VI. Criminal/Illegal Activities**

Federal dollars will not be utilized to pay for any criminal acts that may be punishable with fines, fees and other penalties and/or imprisonment.

- A. Any applicant submitting invoices for payment which explicitly state that part of the bill is inclusive of any illegal activity such as tampering and other theft for services will not be an allowable expense and therefore CSBG/LIHEAP funds cannot be utilized to pay such expenses.
- B. The vendor can adjust the bill to reflect the amount less the fees and the Subgrantee can pay the portion that does not include such fees and penalties. Further, fees and penalties must be paid prior to any CSBG/LIHEAP funds being obligated on behalf of the clients' bill.
- C. Any applicant obtaining services under fraudulent circumstances will be disqualified from receiving services for 6 months from the date of the application.

## **VII. Threats**

- B. Any applicant who makes a verbal or physical threat against a subgrantee agency, any subgrantee staff, subgrantee contractor, or state/federal staff will be prohibited from receiving services for 1 year from the date of application, for the first offense.
  - 1. When a threat is made against subgrantee staff, that staff person must complete an incident report and submit it to the subgrantee's Executive Director.
  - 2. Executive Director must contact local authorities and file a report. A copy of the police report and detailed account of the incident must be kept in the client's file.

Any subsequent threats will disqualify the client from receiving services permanently.

## **VIII. Reconnect/Late Fees**

- C. Reconnect/Late fees resulting from a client losing service due to the inability to pay can be paid upon approval by the supervisor. The agency should be careful not to expend a large percentage of funds paying reconnect fees. During Orientation and other informative sessions, Subgrantees should communicate to the clients the necessity of making timely payments or making arrangements with the vendor in order to avoid such fees.
- D. Paying reconnect/late fees on behalf of clients due to negligence of the Subgrantees to make timely payment(s) will not be eligible for utilizing CSBG/LIHEAP funds.

## **IX. Deposits**

Deposits can be paid once using CSBG/LIHEAP funds except in emergency or life-threatening situations with a lifetime limit of two deposits.

## **X. Eligibility**

D. Applicant must be a resident of the State of Mississippi and must reside in the county of the subgrantee from which assistance is requested. Subgrantee must require that any bills being presented for payment is in the name of a living head of household and/or spouse and include the applicant's address. If a bill is in the name of an incarcerated or deceased spouse, the caseworker, when feasible, shall assist the applicant with the name change; however, the agency may still pay the bill. If the bill is in the name of an estranged or divorced spouse, the agency may assist the client during the initial appointment; however, the bill must be in the head of household's name for all subsequent services. If the bill is in the landlord's name, a form of authorization is needed to verify the tenant's living status. The landlord cannot request services on behalf of tenant/client.

E. A household with an address that straddles county lines must provide proof of Homestead Exemption. A determination of where the taxes are paid is the key in determining which subgrantee and/or caseworker can process the client application. To determine the county for a client who is not eligible for Homestead, other alternatives such as Voter Registration I.D. or the county in which the household receives any other social or human services can be used.

F. Applicants must be eighteen (18) years of age or older or an emancipated minor and must be head of household. Emancipated minors for the purpose of receiving federal assistance from DCS funded programs are those who have received emancipation initiated by court action through the State of Mississippi's social service procedures. Necessary information needed to determine eligibility is as follows but not limited to:

5. Photo I.D. for all household members eighteen (18) or older.
6. Social Security cards for all household members.
7. Copy of certified Birth Certificates for all household members.
8. Proof of household Gross Income.

## **X. Related and/or personal interest cases**

E. Any employee and relatives and/or personal interest cases of employees may apply for and receive assistance; however, there are special procedures for taking and processing these applications. An employee cannot complete the client intake or be involved in the

approval process of a relative. In this occurrence, the caseworker should immediately recuse oneself from any involvement with the case.

- F. The Program Director is responsible for taking and processing applications for employees, relatives of employees or personal interest cases and for submitting the case to the Executive Director for review and authorization of the approval or denial. Applications for assistance from Program Directors or their relatives will be taken and processed by the Executive Director.
- G. The relatives for whom the special procedures must be used include: employee's spouse/ex-spouse, grandparents (also great and great-great grandparents), parents, (including stepparents), brothers and sisters (including stepbrothers and stepsisters, half-brothers and half-sisters), children (including stepchildren), grandchildren (also great and great-great grandchildren), aunts, uncles, nieces, nephews, first & second cousins, and these relatives of an employee's spouse who are related to this degree of marriage.
- H. Furthermore, no preferential treatment will be granted to an employee and his or her relatives and/or personal interest cases. The same process for requesting and receiving assistance that applies for the general public, applies in this case also.

## **XI. Immigration Status**

- D. If the Head of Household is an illegal alien, the application should be denied for the entire household.
- E. If an individual within a household is an illegal alien, does not disclose citizenship or establish satisfactory immigration status, ineligibility exists only for the individual member and not the entire household. The remaining household members should have eligibility determined. During the application process, any individuals within the household who do not wish to comply with citizenship and alien status requirements are considered "Non-Applicants" and should not be questioned about citizenship/alien status. However, these individuals must disclose and verify income and other information needed to establish the eligibility of the household. Eligibility cannot be determined when a Non-Applicant fails to disclose income, therefore, the application should be denied for the entire household. If adequate documentation of immigration status is subsequently provided for the Non-Applicant, the worker shall act upon the reported change in accordance with appropriate timeliness standards.

Most aliens who have entered the United States legally have in their possession documents that were issued by the United States Citizenship and Immigration Services (USCIS) which contains the person's immigration status and the date that person entered the country, or adjusted to the status shown on the card. It is the responsibility of the applicant to provide the USCIS documents prior to eligibility determination. If

the applicant does not provide documents establishing alien status on a timely basis or if alien status is questionable, the eligibility of the remaining household members shall be determined.

The most common documents used to verify alien status include, but are not limited to:

6. Form I-551- Resident Alien Card and Conditional Resident Alien Card
  7. Form I-151- Alien Registration Receipt Card
  8. Form I-94- Arrival-Departure Record (Annotated with Section 207 or refugee, asylum, or paroled)
  9. Form I-688- Temporary Resident Card
  10. Unexpired foreign passport when it contains an endorsement "Processed for I-551. Temporary Evidence of Lawful Admission for Permanent Residence"
- F. When a household or person indicates inability or unwillingness to provide documentation of alien status for any household member, that (non-applicant) member should be classified as "Ineligible", not illegal. Workers are cautioned that a determination that a person is Ineligible is not equivalent to a determination that a person is an illegal alien.

A person will be reported to the appropriate USCIS office under the following circumstances:

4. The applicant, another household member or the authorized representative admits that illegal aliens are present in the household;
5. USCIS documents presented by the household during the application process are determined to be forged;
6. A formal order of deportation or removal is presented by the household during the application process.

## **XII. Public Assistance**

- C. Changes in the CSBG Act require that CSBG clients be referred to the child support office if they are entitled to those support benefits. Clients who fail to comply with child support, TANF or any other form of public assistance requirements can be denied monetary assistance. Agencies should establish working relationships and coordination procedures with local service providers. The question of assistance should be considered when looking at a client's income. Clients who are non-compliant with these procedures will not be allowed to receive monetary assistance or referral services until sanction has been removed.

- D. Sanctions that occurred as a result of child support or any illegal acts involving the use of DCS funded programs will result in sanction from receiving any DCS funding, except that the sanction has been removed or an agreement made with the sanctioning agency. If the household consists of a vulnerable adult/child, DCS funding may be utilized with the approval of supervisory staff.

**XIII. Convicted Individuals**

Individuals with non-controlled substance convictions who have successfully served their time must comply with all the conditions of their release and provide evidence they are in compliance. If those conditions apply, they are eligible for assistance for DCS administered funds.

# **APPENDIX K**

## **ROMA ENTITY DEVELOPMENT GOALS**

### **CSBG OUTCOME INDICATOR MEASUREMENT GOALS**

# ROMA ENTITY DEVELOPMENT GOAL 1

## GOVERNANCE

Please identify using the following matrix levels the current status of each goal within your entity and your projected status for this program year. Please attach a brief description of the actions to be taken to achieve desired goals.

Current Status	Projected Status for Program Year	MATRIX LEVEL	MATRIX CRITERIA
		GOVERNANCE THRIVING	<ul style="list-style-type: none"> <li>7. Board in full compliance with laws governing composition;</li> <li>8. Board and/or committees meet on regularly scheduled basis, with full attendance 50% of time;</li> <li>9. Board actively works to design functional action plans to ensure staff and entity growth and development;</li> <li>10. Vision/mission statements reviewed annually and updated as needed in line with entity/community needs; long range plans in effect; board monitors/evaluates program operations for compliance;</li> <li>11. Engages in on-going training on role and responsibilities;</li> <li>12. Members enthusiastic about their role and mission of entity; works to strengthen entity in community.</li> </ul>
		GOVERNANCE SAFE/SELF-SUFFICIENT	<ul style="list-style-type: none"> <li>6. Board and/or committee meet on scheduled basis, with quorum in attendance 75% of time;</li> <li>7. Action plans are followed to ensure entity/staff remain current in fiscal year; short range plans in effect;</li> <li>8. Vision/mission reviewed annually; timely monitors/evaluates programs for compliance;</li> <li>9. Board training is done at least bi-annually;</li> <li>10. Board members cognizant of their role and act accordingly; support is shown to strengthen entity role in community.</li> </ul>
		GOVERNANCE AT-RISK	<ul style="list-style-type: none"> <li>5. No regularly scheduled committee meetings; lacks quorum at over 30% of board meetings;</li> <li>6. Vision mission is unclear and unfocused; little monitoring/evaluation for program is done;</li> <li>7. Board has no training schedule; most unsure of role;</li> <li>8. No board action to support community awareness of entity.</li> </ul>
		GOVERNANCE IN CRISIS	<ul style="list-style-type: none"> <li>5. Board structure not in compliance with law or one-third requirement;</li> <li>6. Board and/or committee meet irregularly or not at all;</li> <li>7. No mission or vision established for entity;</li> <li>8. No board training offered; no support for entity activities; no community awareness activities take place.</li> </ul>

## ROMA ENTITY DEVELOPMENT GOAL 2

### MISSION INTEGRATION

Please identify using the following matrix levels the current status of each goal within your entity and your projected status for this program year. Please attach a brief description of the actions to be taken to achieve desired goals.

Current Status	Projected Status for Program Year	MATRIX LEVEL	MATRIX CRITERIA
		MISSION INTEGRATION THRIVING	<ol style="list-style-type: none"> <li>4. Vision and mission clear and are the focus of entity programs;</li> <li>5. Board and staff involved in on-going training and kept informed on all issues that impact entity; program are changed as necessary to ensure they meet objectives;</li> <li>6. Entity is strong and viable in community; set objectives are exceeded; constantly work to improve service results.</li> </ol>
		MISSION INTEGRATION SAFE/SELF-SUFFICIENT	<ol style="list-style-type: none"> <li>4. Vision and mission clear and are the focus of entity programs; reviewed annually to ensure community's needs are met;</li> <li>5. Board and staff involved in set training and informed on issues that impact entity; programs are changed annually to meet set objectives;</li> <li>6. Entity is well-known in community; programs in place to provide services according to vision/mission; 90% of program objectives are met.</li> </ol>
		MISSION INTEGRATION STABLE	<ol style="list-style-type: none"> <li>4. Vision/mission has been defined and service plans are being developed;</li> <li>5. Board/staff involved in periodic training and informed on issues that impact entity; programs are reviewed and evaluated annually to meet objectives;</li> <li>6. Community is aware of entity; 70% of program objectives are met.</li> </ol>
		MISSION INTEGRATION AT-RISK	<ol style="list-style-type: none"> <li>6. Vision/mission is fragmented and not in line with entity purpose;</li> <li>7. Board/staff involved in some training; programs are reviewed/evaluated periodically;</li> <li>8. Entity program are stretching staff capacity to function;</li> <li>9. Community is aware of entity; some efforts are made to address concerns in community;</li> <li>10. Community is not fully aware of entity; very little efforts are made to address concerns in community.</li> </ol>

## ROMA ENTITY DEVELOPMENT GOAL 3

### ADMINISTRATION AND FISCAL HEALTH

Please identify using the following matrix levels the current status of each goal within your entity and your projected status for this program year. Please attach a brief description of the actions to be taken to achieve desired goals.

Current Status	PROJECTED STATUS FOR PROGRAM YEAR	MATRIX LEVEL	MATRIX CRITERIA
		ADMIN. & FISCAL HEALTH THRIVING	<ul style="list-style-type: none"> <li>5. Entity has sufficient funds, both federal and private to support all existing entity operations;</li> <li>6. Entity has adequate resources to support operations in face of cuts or elimination of one or more federal programs;</li> <li>7. Entity has good public relation programs in place which results in wide spread community support;</li> <li>8. Sound leadership and governance.</li> </ul>
		ADMIN. & FISCAL HEALTH SAFE/SELF-SUFFICIENT	<ul style="list-style-type: none"> <li>4. Entity has two or more income producing projects/collaborations that will lessen dependence on federal funds;</li> <li>5. Entity leadership and governance is sound;</li> <li>6. Entity working towards administrative and fiscal improvements.</li> </ul>
		ADMIN & FISCAL HEALTH STABLE	<ul style="list-style-type: none"> <li>5. Entity budget is 100% outlined, with comparative data on existing and needed resources for implementation;</li> <li>6. Working partnerships in place to promote entity growth;</li> <li>7. Entity is fiscally accountable with no serious monitoring or audit findings;</li> <li>8. Entity vision and mission is clear; board and staff geared towards mission accomplishments.</li> </ul>
		ADMIN. & FISCAL HEALTH AT-RISK	<ul style="list-style-type: none"> <li>5. Entity has little or no community support;</li> <li>6. Loss of any federal funds result in suspension or termination of services or reduction of staff;</li> <li>7. Outside intervention may be needed to prevent serious accounting problems;</li> <li>8. One or more serious audit findings.</li> </ul>
		ADMIN. & FISCAL HEALTH IN-CRISIS	<ul style="list-style-type: none"> <li>8. Entity leadership and governance is at odds;</li> <li>9. Ability of administrative staff is insufficient to carry out direction of board;</li> <li>10. Entity funding terminated due to non-compliance with procedures, regulations or ordinances;</li> <li>11. Entity has problem with one or more funding sources;</li> <li>12. Outside intervention is needed to prevent entity failure;</li> <li>13. Entity is dependent on federal funding for over 100% of program operations;</li> <li>14. Outside intervention is required to prevent entity failure.</li> </ul>

## ROMA ENTITY DEVELOPMENT GOAL 4

### PLANNING AND EVALUATION

Please identify using the following matrix levels the current status of each goal within your entity and your projected status for this program year. Please attach a brief description of the actions to be taken to achieve desired goals.

Current Status	PROJECTED STATUS FOR PROGRAM YEAR	MATRIX LEVEL	MATRIX CRITERIA
		PLANNING AND EVALUATION THRIVING	<ul style="list-style-type: none"> <li>5. Staff and board equally involved in planning/evaluation of all entity programs; programs mission driven;</li> <li>6. Program goals and objectives are realistic in terms of entity/staff capacity and ability;</li> <li>7. Programs meet all conditions for funding and are funded over 95% of times;</li> <li>8. Programs rated as outstanding by outside source; often used as model programs.</li> </ul>
		PLANNING AND EVALUATION SAFE/SELF-SUFFICIENT	<ul style="list-style-type: none"> <li>7. Schedule for internal evaluation maintained and carried out on acceptable basis;</li> <li>8. Community involvement requested and uses in formation of plans;</li> <li>9. Programs meet all conditions for funding and are funded 90% of time;</li> <li>10. Orientation/training for programs provided to board/staff;</li> <li>11. Programs rated excellent by outside source;</li> <li>12. Constantly seeking new funding sources based on community needs.</li> </ul>
		PLANNING AND EVALUATION STABLE	<ul style="list-style-type: none"> <li>8. Internal evaluation schedule is in place, but not properly followed;</li> <li>9. Programs loosely based on actual community needs assessment; assessment not fully complete;</li> <li>10. Program barely meet conditions of current funding sources;</li> <li>11. Staff and board partially involved in planning and evaluation of programs;</li> <li>12. Training is erratic; no technical assistance given;</li> <li>13. Programs rated satisfactory by outside source;</li> <li>14. Periodic training and technical assistance given.</li> </ul>
		PLANNING AND EVALUATION AT-RISK	<ul style="list-style-type: none"> <li>4. Board fails to approve program applications;</li> <li>5. Plans are not tied to community needs;</li> <li>6. No efforts are made to improve program design;</li> <li>6. Community unaware of programs or their purpose;</li> <li>7. Community not involved in planning.</li> </ul>
		PLANNING AND EVALUATION IN-CRISIS	<ul style="list-style-type: none"> <li>4. Board not involved in entity planning, possesses limited knowledge of entity programs and services;</li> <li>5. Programs rarely, if ever, funded; never seeks new programs;</li> <li>6. Plan, when made, not tied to community needs;</li> <li>6. Program ineffective in solving problems for which designed to meet;</li> <li>7. Board and staff not open to new ideas; unwilling to change.</li> </ul>

## ROMA ENTITY DEVELOPMENT GOAL 5

### FUND DEVELOPMENT

Please identify using the following matrix levels the current status of each goal within your entity and your projected status for this program year. Please attach a brief description of the actions to be taken to achieve desired goals.

Current Status	PROJECTED STATUS FOR PROGRAM YEAR	MATRIX LEVEL	MATRIX CRITERIA
		FUND DEVELOPMENT THRIVING	<ul style="list-style-type: none"> <li>7. Constant search for innovative funding sources;</li> <li>8. Fund development include efforts to increase non-federal base;</li> <li>9. Community has bought into entity funding needs, and support is high level;</li> <li>10. Fund development committee functioning on regular basis;</li> <li>11. Board place fund development high on list of entity priorities;</li> <li>12. 5% annual increases of funding base.</li> </ul>
		FUND DEVELOPMENT SAFE/SELF-SUFFICIENT	<ul style="list-style-type: none"> <li>5. Board is actively involved in fund development;</li> <li>6. Set goals for development in line with entity needs;</li> <li>7. Projects future needs and plans accordingly;</li> <li>8. Has increased local support by at least 1% over previous year.</li> </ul>
		FUND DEVELOPMENT STABLE	<ul style="list-style-type: none"> <li>5. Board annually reviews entity funding needs;</li> <li>6. Safe priority for existing funds and goals for additional needs;</li> <li>7. Entity plans including goals to decrease dependence on federal funds;</li> <li>8. Entity has good local financial support.</li> </ul>
		FUND DEVELOPMENT AT-RISK	<ul style="list-style-type: none"> <li>5. Dependence on federal funds is extremely high;</li> <li>6. Board has no viable plan for increasing funding base;</li> <li>7. Sees no need to reduce federal level;</li> <li>8. Local support is limited.</li> </ul>
		FUND DEVELOPMENT IN-CRISIS	<ul style="list-style-type: none"> <li>7. No plan for fund development;</li> <li>8. Fund development is limited to crisis intervention management;</li> <li>9. No local financial support of entity;</li> <li>10. Fund development is not goal or high priority of entity;</li> <li>11. Totally dependent on federal funds;</li> <li>12. Sees no need to reduce dependency on federal funds.</li> </ul>

## ROMA ENTITY DEVELOPMENT GOAL 6

### COLLABORATION AND PARTNERSHIP

Please identify using the following matrix levels the current status of each goal within your entity and your projected status for this program year. Please attach a brief description of the actions to be taken to achieve desired goals.

Current Status	PROJECTED STATUS FOR PROGRAM YEAR	MATRIX LEVEL	MATRIX CRITERIA
		COLLAB. & PARTNERSHP THRIVING	<ul style="list-style-type: none"> <li>6. Working collaboration/partnership with most all facets of community to fill service gaps;</li> <li>7. Establish new partnerships – ten or more each year;</li> <li>8. Entity is consistently approached by outside sources to form working partnerships;</li> <li>9. Collaborations and partnerships substantially (5% or more) increasing financial base;</li> <li>10. Established continuum of care for community in place.</li> </ul>
		COLLAB. & PARTNERSHP SAFE/SELF-SUFFICIENT	<ul style="list-style-type: none"> <li>6. Establishing five to ten new partnerships each year;</li> <li>7. Community support of entity ventures extremely high;</li> <li>8. Existing partnerships generating resources for entity;</li> <li>9. Collaboration/partnership has potential of decreasing dependence on federal funds;</li> <li>10. Actively working to establish a continuum of care.</li> </ul>
		COLLAB. & PARTNERSHP STABLE	<ul style="list-style-type: none"> <li>5. Has at least five working partnerships within community;</li> <li>6. Support for entity programs above average;</li> <li>7. Foundation is established to create continuum of care for community;</li> <li>8. Local public/private support increased by at least 1% over previous year.</li> </ul>
		COLLAB. & PARTNERSHP AT-RISK	<ul style="list-style-type: none"> <li>5. Establishing partnerships/collaborative agreements are not part of entity plans;</li> <li>6. Community offers very limited support of entity/programs; has vague idea about entity purpose;</li> <li>7. Entity has two or three existing partnerships in the community;</li> <li>8. Very minimal public/private financial support.</li> </ul>
		COLLAB. & PARTNERSHP IN-CRISIS	<ul style="list-style-type: none"> <li>5. No plan or desire to establish partnerships with community;</li> <li>6. Community offers no support for entity/programs; has no idea about entity purpose;</li> <li>7. Entity has no existing partnership in community and/or partnerships has produced no viable resources for entity;</li> <li>8. Totally dependent on federal funds.</li> </ul>

## ROMA ENTITY DEVELOPMENT GOAL 7

### CULTURAL SENSITIVITY AND COMPETENCE

Please identify using the following matrix levels the current status of each goal within your entity and your projected status for this program year. Please attach a brief description of the actions to be taken to achieve desired goals.

Current Status	PROJECTED STATUS FOR PROGRAM YEAR	MATRIX LEVEL	MATRIX CRITERIA
		CUL. SENSITIVITY & COMPETENCE THRIVING	<ul style="list-style-type: none"> <li>6. Entity has excellent record of employment individuals of diverse cultural and ethnic backgrounds;</li> <li>7. Provides regular training to board and staff on cultural diversity and sensitivity;</li> <li>8. Is recognized in community for efforts to promote unity and acceptance of all races;</li> <li>9. Has strong entity policy prohibiting discrimination and any mistreatment of people;</li> <li>10. Regularly monitors compliance of entity policies and strictly enforces violation.</li> </ul>
		CUL. SENSITIVITY & COMPETENCE SAFE/SELF-SUFFICIENT	<ul style="list-style-type: none"> <li>5. Has established policies which prohibits the mistreatment of individuals based on cultural differences, race, sex or religion preference;</li> <li>6. Provides training to board and staff to promote cultural sensitivity;</li> <li>7. Promotes inclusiveness through programs and activities;</li> <li>8. Have fair and just hiring practices.</li> </ul>
		CUL. SENSITIVITY & COMPETENCE STABLE	<ul style="list-style-type: none"> <li>5. Has made efforts in the community to recognize cultural diversity and promote sensitivity and awareness;</li> <li>6. Meet all federal and state requirements of compliance against discrimination;</li> <li>7. Has established and/or adopted policies to ensure entity compliance;</li> <li>8. Have no complaints of discrimination or insensitivity.</li> </ul>
		CUL. SENSITIVITY & COMPETENCE AT-RISK	<ul style="list-style-type: none"> <li>6. Has made no efforts, nor taken stand in community to promote cultural diversity;</li> <li>7. Has federal mandates against discrimination, but has no local entity or policy;</li> <li>8. Has selective hiring practices;</li> <li>9. Has no training for board and staff on cultural sensitivity;</li> <li>10. Does not monitor staff action for compliance.</li> </ul>
		CUL. SENSITIVITY & COMPETENCE IN-CRISIS	<ul style="list-style-type: none"> <li>5. Has had numerous complaints for unfair hiring practices;</li> <li>6. Does not investigate allegations of misconduct by board members or staff;</li> <li>7. Has been in violation of federal and state non-discrimination laws;</li> <li>8. Has poor record in community for advocacy.</li> </ul>

## ROMA ENTITY DEVELOPMENT GOAL 8

### COMMUNITY DEVELOPMENT IMPACT

Please identify using the following matrix levels the current status of each goal within your entity and your projected status for this program year. Please attach a brief description of the actions to be taken to achieve desired goals.

Current Status	PROJECTED STATUS FOR PROGRAM YEAR	MATRIX LEVEL	MATRIX CRITERIA
		COMM. DEV. IMPACT THRIVING	<ul style="list-style-type: none"> <li>5. Entity is viable in community and considered a major employer;</li> <li>6. Has several ventures to improve the condition of community and its economic base;</li> <li>7. Actively works to remove a condition which stifle the productive development of residents;</li> <li>8. Has stake in community and commits resources towards its development.</li> </ul>
		COMM. DEV. IMPACT SAFE/SELF-SUFFICIENT	<ul style="list-style-type: none"> <li>4. Has established long-term goals for community development;</li> <li>5. Board and staff work to change conditions in community which prohibits growth;</li> <li>6. Has achieved short-term and established long-term goals for community development.</li> </ul>
		COMM. DEV. IMPACT STABLE	<ul style="list-style-type: none"> <li>2. Entity working toward meeting short-term community development goals.</li> </ul>
		COMM. DEV. IMPACT AT-RISK	<ul style="list-style-type: none"> <li>3. Goals for community development set, but there is no viable impact in community;</li> <li>4. Community support limited.</li> </ul>
		COMM. DEV. IMPACT IN-CRISIS	<ul style="list-style-type: none"> <li>4. Entity has not included community development as part of mission;</li> <li>5. No set goals for community development;</li> <li>6. Has no community involvement or support.</li> </ul>

# ROMA ENTITY DEVELOPMENT GOAL 9

## CLIENT SATISFACTION

Please identify using the following matrix levels the current status of each goal within your entity and your projected status for this program year. Please attach a brief description of the actions to be taken to achieve desired goals.

Current Status	PROJECTED STATUS FOR PROGRAM YEAR	MATRIX LEVEL	MATRIX CRITERIA
		CLIENT SATISFACTION THRIVING	<ul style="list-style-type: none"> <li>5. Clients readily show appreciation of entity for services offered;</li> <li>6. Clients feel complete confidence in entity and its ability and willingness to help;</li> <li>7. Clients are fully knowledgeable of entity services;</li> <li>8. Entity service to clients rated as excellent or outstanding by funding sources and clients alike.</li> </ul>
		CLIENT SATISFACTION SAFE/SELF-SUFFICIENT	<ul style="list-style-type: none"> <li>6. Entity set high priority on client involvement;</li> <li>7. Goals for entity include client satisfaction;</li> <li>8. Bi-annual evaluations are done to measure degree of success;</li> <li>9. Entity is well known in community;</li> <li>10. Entity has established partnerships to increase its capacity to meet client's need.</li> </ul>
		CLIENT SATISFACTION STABLE	<ul style="list-style-type: none"> <li>5. Clients are involved in entity planning process;</li> <li>6. Workers seek to meet client's need in comfortable environment;</li> <li>7. Regular program evaluation is done to ensure compliance;</li> <li>8. Clients feel good about entity and believe their needs will be met.</li> </ul>
		CLIENT SATISFACTION AT-RISK	<ul style="list-style-type: none"> <li>5. Entity has own agenda, of which client services is not a high priority;</li> <li>6. Clients are hesitate to request assistance;</li> <li>7. Entity does not welcome client input in planning process;</li> <li>8. Program evaluation is seldom done.</li> </ul>
		CLIENT SATISFACTION IN-CRISIS	<ul style="list-style-type: none"> <li>8. Community needs assessment are not done;</li> <li>9. Programs are designed without client input;</li> <li>10. Clients not informed of available services;</li> <li>11. Clients made to feel uncomfortable in asking for services;</li> <li>12. Worker's attitude is negative;</li> <li>13. Clients do not feel entity can or will meet their needs;</li> <li>14. Entities capacity to achieve results for clients is non-existent.</li> </ul>

## ROMA ENTITY DEVELOPMENT GOAL 10

### SELF-SUFFICIENCY IMPACT

Please identify using the following matrix levels the current status of each goal within your entity and your projected status for this program year. Please attach a brief description of the actions to be taken to achieve desired goals.

Current Status	PROJECTED STATUS FOR PROGRAM YEAR	MATRIX LEVEL	MATRIX CRITERIA
		SELF-SUFFICIENCY IMPACT THRIVING	<ul style="list-style-type: none"> <li>6. Entity no longer dependent on federal funds for operation;</li> <li>7. Fund development efforts generate working capital;</li> <li>8. Board and staff morale at high level;</li> <li>9. Self-sufficiency goals updated annually;</li> <li>10. Entity has total community support.</li> </ul>
		SELF-SUFFICIENCY IMPACT SAFE/SELF-SUFFICIENT	<ul style="list-style-type: none"> <li>6. Entity has working partnerships in community which generate funds;</li> <li>7. Excellent community support;</li> <li>8. Long-term goals established to remove dependence on federal funds;</li> <li>9. Board and staff actively working on plan;</li> <li>10. Entity supporting over 50% of operating costs.</li> </ul>
		SELF-SUFFICIENCY IMPACT STABLE	<ul style="list-style-type: none"> <li>6. Entity has good community support;</li> <li>7. Receives local funds from community;</li> <li>8. Has developed plan for increasing funding base;</li> <li>9. Board and staff actively involved in plans;</li> <li>10. Have decreased some dependence on federal funds.</li> </ul>
		SELF-SUFFICIENCY IMPACT AT-RISK	<ul style="list-style-type: none"> <li>5. Makes no efforts to increase funding base;</li> <li>6. Has no long-term goals for self-sufficiency;</li> <li>7. Heavily dependent on federal funds;</li> <li>8. Community support limited.</li> </ul>
		SELF-SUFFICIENCY IMPACT IN-CRISIS	<ul style="list-style-type: none"> <li>5. Board and staff have low morale;</li> <li>6. Board and staff set inappropriate priorities;</li> <li>7. Entity totally depended on federal funds;</li> <li>8. Has no support in community.</li> </ul>

## 2015 CSBG Outcome Indicator Measurement Goals

In the categories listed below, please provide the number of clients your agency will assist in obtaining the listed outcomes goals:

Employment		Education	
# of people served	# of people served		
	In Crisis		In Crisis
	At-Risk		At-Risk
	Stable		Stable
	Self-Reliant		Self-Reliant
	Thriving		Thriving
Received a full time job above minimum wages		Completed Literacy/ABE Training	
Received a full time job with minimum wages		Completed GED	
Received a part job above minimum wages		Completed vocational training/acquired job skills	
Received a part time job with minimum wages		Graduated with a 2-year degree	
Received training, job application assistance, and resume writing.		Graduated with a 4-year degree	
Received vocational training, internships, on-the-job training, and summer jobs.		Assisted with child care classes	
Received supportive services (i.e. counseling, transportation, child care, and the purchase of uniforms or work clothing.		Assisted with programs to enhance academic achievement of students in grades K-12 (i.e., drug or alcohol use and preventing violence )	
		Assisted with scholarship for college of technical school	
		Alternative opportunities for school dropouts and those at-risk of dropping out	

## 2015 CSBG Outcome Indicator Measurement Goals

In the categories listed below, please provide the number of clients your agency will assist in obtaining the listed outcomes goals:

Emergency Services	Health & Safety
# of people served	# of people served
In Crisis	In Crisis
At-Risk	At-Risk
Stable	Stable
Self-Reliant	Self-Reliant
Thriving	Thriving
Emergency temporary housing	Health insurance: non-employer
Assisted with rental/mortgage and/or provided intervention with landlords	Health Insurance: employer
Energy crisis assistance and utility shut-off prevention	Home is safe and fully accessible
Assisted with emergency food, clothing and furniture	Family has identified physician/clinic
Assisted with crisis intervention to child or spousal abuse	Individual has permanent care provider
Assisted with emergency heating system repair	Completed health education training
Linkages with other services and organizations to assemble a combination of short-term resources and long-term support	Clear evidence of good personal hygiene
	Partnering with health institutions (i.e., health screening, immunization, prenatal care, maternal health, and infant health screenings, dental care, substance abuse and other serious health problems
	Transportation to health care facilities and medical appointments

## 2015 CSBG Outcome Indicator Measurement Goals

In the categories listed below, please provide the number of clients your agency will assist in obtaining the listed outcomes goals:

Income Management		Housing	
# of people served		# of people served	
	In Crisis		In Crisis
	At-Risk		At-Risk
	Stable		Stable
	Self-Reliant		Self-Reliant
	Thriving		Thriving
	Completed money management skills training		Safe and adequate housing: subsidized
	Debt free		Safe and adequate housing: single family rental
	Monthly income meets/exceeds expenses		Safe and adequate housing: single family owner
	Has a checking account		Spending less than 1/3 of income on housing
	Has a savings account		Home has been weatherized
	All income is from wages/salaries		Home has been repaired/rehabilitated
			Assisted in providing transitional shelter, group home and/or services for the homeless
	Consumer credit counseling		
	Tax counseling and tax preparation assistance		Assisted in home ownership counseling and loan assistance
	Assistance for the elderly with claims for medical and other benefits		

## 2015 CSBG Outcome Indicator Measurement Goals

In the categories listed below, please provide the number of clients your agency will assist in obtaining the listed outcomes goals:

<b>Nutrition</b>						
	# of people served					
	In Crisis					
	At-Risk					
	Stable					
	Self-Reliant					
	Thriving					
	Free of government assistance for food					
	Require limited government assistance					
	Assisted families with meals in group settings					
	Completed nutritional education training					
	partnering with food supplies and/or management support					
	Help initiate self-help projects, such as community gardens, community canneries and food buying groups.					