Title 18: Human Services

Part 15: Division of Community Services

Part 15 Chapter 1: Community Services Block Grant (CSBG)

Rule 15.1 Community Services Block Grant (CSBG) State Plan

Source: Miss Code Annotated 43-1-2.

Community Services Block Grant (CSBG) Model State Plan - DRAFT

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SECTION 1
Designation of Lead Agency and Official State Designation Letter

1.1. Lead Agency designated to administer CSBG in the State, as required by Section 676(a) of the Act. The following information should mirror the information provided in the SF-424M.

1.1a. **Mississippi Department of Human Services**

1.1b. Identify the cabinet or administrative department of this Agency [Check One]

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

1.1c. **Mississippi Department of Human Services**

1.1d. **John Davis, Executive Director**

1.1e. **Post Office Box 352**

1.1f. **Jackson**

1.1g. **Mississippi**

1.1h. **39205**

1.1i. **(601) 359-4768**

1.1j. **(601) 359-4370**

1.1k. **tina.ruffin@mdhs.ms.gov**

1.1l. **http://www.mdhs.state.ms.us/**

1.2. Please provide the following information in relation to the designated State CSBG Contact.

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

1.2a. **Division of Community Services**

1.2b. **Tina Ruffin**

1.2c. **Post Office Box 352**

1.2d. **Jackson**

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1.2e. **Mississippi**

1.2f. **39205**

1.2g. **(601) 359-4768**

1.2h. **(601) 359-4370**

1.2i. **tina.ruffin@mdhs.ms.gov**

1.2j. **http://www.mdhs.state.ms.us/**

1.3. Please attach the State's official designation letter. If either the governor or designated agency has changed, please update the letter.

See Attachment

Instructional Note: The letter should be from the chief executive officer of the State and include the designated State CSBG Lead Agency, the designated State CSBG Official who is to receive the CSBG grant award, the CSBG Contact Person, and complete addresses and contact information for the agency and individuals.

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SECTION 2
State Legislation and Regulation

2.1. CSBG State Legislation: Does the State have a statute authorizing CSBG?

☐ Yes ☒ No

2.2. CSBG State Regulation: Does the State have regulations for CSBG?

☐ Yes ☒ No

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

See Attachment

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

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

☐ Yes ☒ No

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

☐ Yes ☒ No

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

☒ Yes ☐ No

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SECTION 3
State Plan Development and Statewide Vision and Goals

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

The 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 serving low-income individuals.

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

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.

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f) Encourage eligible entities to sponsor summer projects and year-round 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 or employment agencies.

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) Encourage entities participate in the ACH process for paying energy vendors.

q) Require entities to submit financial and programmatic reports through Mississippi's Accountability System for Government Information and Collaboration (MAGIC).

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

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

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

- ☒ State National Performance Indicators (NPIs)
- ☒ U.S. Census data
- ☒ State performance management data (e.g., accountability measures, other information from annual reports)
- ☐ Other data (please describe) _____
- ☒ Eligible entity community assessments
- ☒ Eligible entity plans
- ☐ Other information from eligible entities, e.g., State required reports (please describe) _____

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

- ☒ Eligible entities (e.g., meetings, conferences, webinars; not including the public hearing)
- ☒ State community action association and regional CSBG T & TA providers
- ☒ State partners and/or stakeholders (please describe)_____
- ☒ National organizations (please describe)**NASCSP & NEADA**
- ☐ Other (please describe) _____

3.4. Eligible Entity Involvement

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

The State CSBG office made the draft state plan available to the eligible entities via the Virtual ROMA website and copies were also mailed to the Executive Directors. By making the plan accessible on the website, any staff member of the eligible entities can provide input on the plan. Comments were accepted through July 5, 2016. The state plan was also presented at the public hearing for input and comments. A state workgroup consisting of eligible entities were convened to develop and modify the state plan.

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

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

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

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A state workgroup consisting of eligible entities were convened to develop and modify the state plan. The workgroup made suggestions and recommendations.

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

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

3.5. Eligible Entity Overall Satisfaction: Provide the State's target for eligible entity Overall Satisfaction during the performance period:

85%

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

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

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SECTION 4
CSBG Hearing Requirements

4.1. Public Inspection: Describe how the State made this State Plan, or revision(s) to the State Plan, available for public inspection, as required under Section 676(e)(2) of the Act.

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 twenty (20) days before the Public Hearing.

Notice of the public hearing appeared in the Clarion Ledger, with statewide distribution, and ten other newspapers on May 26, 2016 and June 2, 2016.

The availability of the FFY 2016 CSBG State Plan for inspection was made known in the Public Hearing announcement posted in the newspaper. 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 2:00 pm on June 28, 2016 at the Mississippi Department of Human Services, 750 North State Street, Jackson, MS.

4.2. Public Notice/Hearing: Describe how the State ensured there was sufficient time and statewide distribution of notice of the hearing(s) to allow the public to comment.

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 twenty (20) days before the Public Hearing.

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public hearing held at 2:00 pm on June 28, 2016 at the Mississippi Department of Human Services, 750 North State Street, Jackson, MS.

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

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

Date	**Location**	**Type of Hearing [Select an option]**
June 28, 2016	**Mississippi Department of Human Services, 750 North State Street, Jackson, MS**	• Public • Legislative • **Combined**
ADD a ROW function Note: you will be able to add a row for each additional hearing		

4.4. Attach supporting documentation for the public and legislative hearings.

See Public Hearing Notice Attachment

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SECTION 5
CSBG Eligible Entities

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

CSBG Eligible Entity	Public or Nonprofit	Type of Entity (choose all that apply)	Geographical Area Served by county (Provide all counties)	Brief Description of "Other"
See Attachment	**See Attachment**	• **Community Action Agency** • Limited Purpose Agency • Local Government Agency • Migrant or Seasonal Farmworker Organization • Tribe or Tribal Organization • Other (describe in column 5)	**See Attachment**	**N/A**
ADD A ROW function Note: rows will be able to be added for each eligible entity funded in the State				

5.2 Total number of CSBG eligible entities: __**17**__ [This will automatically update based on chart in 5.1]

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

☒ Yes ☐ No [If yes is selected – narrative, 2500 characters]

The Board of Directors of the Gulf Coast Community Action Agency voluntarily relinquished its CSBG grant effective December 31, 2015.

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

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failure to comply with that Act and that has not lost its designation as an eligible entity under the CSBG Act.

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

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SECTION 6
Organizational Standards for Eligible Entities

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

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

- ☒ The State will use the CSBG Organizational Standards Center of Excellence (COE) organizational standards (as described in IM 138)
- ☐ The State will use an alternative set of organizational standards [Provide supporting documentation if this option is selected]

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

☒ Yes ☐ No

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

The State will use a modified version of the COE-developed organizational standards to comply with state policies already in place. Mississippi uses a "Community Strengths and Needs Assessment" instead of the term Community Assessment. The modified COE-developed organizational standards are:

Standard 3.1- The organization will conduct a community strength and needs assessment yearly.

Standard 5.5- The board fills vacancies as set out in its bylaws and state board policy.

Standard 9.4- Agency submits the CSBG IS report to MDHS-DCS.

6.3. How will/has the State officially adopt(ed) organizational standards for eligible entities in the State? If "Other" is selected, please provide a timeline and additional information, as necessary. [Check all that apply]

- ☐ Regulation
- ☒ Policy
- ☒ Contracts with eligible entities
- ☐ Other, describe: [Narrative Response, 2500 characters]

6.4. How will the State assess eligible entities against organizational standards? If "Other" is selected, please provide additional information, as appropriate. [Check all that apply]

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☐ Peer-to-peer review (with validation by the State or State-authorized third party)
☒ Self-assessment (with validation by the State or State-authorized third party)
☐ Self-assessment/peer review with State risk analysis
☒ Regular, on-site CSBG monitoring
☒ Other, describe: [Narrative Response, 2500 characters]

6.4a. Describe the assessment process.

The State has requested and received self-assessments from the eligible entities. Reviews are in progress. Self-assessments will be requested and reviewed annually. The State has met with the Division of Program Integrity (DPI) to update the monitoring tool to include the Organizational Standards. Effective FFY 2016, DPI will monitor eligible entities on the standards. Also, as part of the Division of Community Services Training and Technical Assistance reviews, compliance to the standards will be reviewed, and assistance will be given to assure entities met the standards. The State will note standards not met and give the entity a reasonable amount of time to comply, based on the standard.

6.5. Will the State make exceptions in applying the organizational standards for any eligible entities due to special circumstances or organizational characteristics, as described in IM 138, *State Establishment of Organizational Standards for CSBG Eligible Entities*?

☐ Yes ☒ No

6.6a. If yes was selected in Item 6.6, list which eligible entities, the State will exempt from meeting organizational standards, and provide a justification. [Narrative Response, 2500 characters]

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

6.6. Target: What percentage of assessed eligible entities in the State does the State expect will meet the State-adopted organizational standards in the next year?

55%

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

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SECTION 7
State Use of Funds

90 Percent Funds

7.1 Formula: Please select the method (formula) that best describes the current practice for allocating CSBG funds to eligible entities. [Dropdown options]

- Historic
- Base + Formula
- **Formula Alone**
- Formula with Variables
- Hold Harmless + Formula
- Other [Narrative, 2500 Characters]

7.1a. Does the State statutory or regulatory authority specify the terms or formula for allocating the 90 percent funds among eligible entities?

☒ Yes ☐ No

7.2. Planned allocation: Specify the planned allocation of 90 percent funds to eligible entities, as described under Section 675C(a) of the CSBG Act. The estimated allocations may be in dollars or percentages. Please complete either column 2, "Funding Amount in $," OR column 3, "Funding Amount in %."

Planned CSBG 90 Percent Funds				
CSBG Eligible Entity	Year One		Year Two	
	Funding Amount $	Funding Amount %	Funding Amount $	Funding Amount %
Will be auto-populated from Section 5, Table 5.1, Column 1	**See Attachment**		**N/A**	
Total	**See Attachment**		**N/A**	

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

Ninety (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 outcome-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.

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

☐ Yes ☒ No

7.4a. If no, describe State procedures to ensure funds are made available to eligible entities consistently and without interruption.

Once DCS has obtained prior approval from the Executive Director's Office, NOFAs are mailed to the subgrantees. The subgrantees submit proposals to DCS sixty (60) days after the date the NOFAs were mailed. The Fiscal and Program staff review the proposals for any errors/additional information, and from there we start the Negotiating process. After the staff completes the reviews, copies of the proposals are passed on to Budgets and Accounting, Office of Monitoring and Attorney General's Office for signature approval. Once approval has been obtained from all three of these supporting divisions, the proposals are submitted to the Executive Director's Office (EDO) for final approval (EDO requires all contracts/subgrants be

submitted to their office thirty (30) days prior to the effective date). Immediately after contracts/subgrants have been approved in the EDO, DCS Contract Unit packages all contracts/subgrants and distributes them to subgrantees, DCS Fiscal Staff and supporting divisions (Budgets and Accounting and Office of Monitoring). Subgrantees are now able to request to draw down funds to operate their program.

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

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

7.5. Performance Management Adjustment: How is the State improving grant administration procedures under this State Plan as compared to past plans? Any improvements should be based on analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources. If the State is not making any improvements, please

Mississippi Department of Human Services- Division of Community Services will be working with SEETAS to review and modify state policies and procedures. Additionally, the state has formed a workgroup of eligible entities to modify performance requirements.

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

7.6. What amount of State CSBG funds does the State plan to allocate for administrative activities, under this State plan? The estimate may be in dollars or a percentage.

5%

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

10

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

0

<u>Remainder/Discretionary Funds [Section 675C(b) of the Act]</u>

7.9. Describe how the State plans to use remainder/discretionary funds, as described in Section 675C(b) of the Act, as required by the assurance in 676(b)(2) of the CSBG Act.

☒ Yes ☐ No

Instructional Note: The information entered in the table below will pre-populate the corresponding assurance [676(b)(2)] under Item 14.2 in the "CSBG Programmatic Assurances and Information Narrative." Please note: the assurance under 676(b)(2) of the Act specifically requires a description of how the State intends to use

remainder/discretionary funds to "support innovative community and neighborhood-based initiatives related to the purposes of [the CSBG Act]." Please include this description in row "f" of the table below and/or attach the information.

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

Use of Remainder/Discretionary Funds					
Remainder/ Discretionary Fund Uses (See 675C(b)(1) of the CSBG Act)	Year One		Year Two		Brief description of services/activities
	Planned $	Planned %	Planned $	Planned %	
a. Training/technical assistance to eligible entities	**47%**		**N/A**		[Not Fillable] These planned services/activities will be described in State Plan Item 8.1
b. Coordination of State-operated programs and/or local programs	**10%**				[Not Fillable] These planned services/activities will be described in State Plan Item 9.1 and 9.2
c. Statewide coordination and communication among eligible entities	**0%**				[Not Fillable] These planned services/activities will be described in in State Plan Items 9.3 – 9.5
d. Analysis of distribution of CSBG funds to determine if targeting greatest need	**0%**				[Narrative, 2500 characters]
e. Asset-building programs	**0%**				[Narrative, 2500 characters]
f. Innovative programs/ activities by CAAs or other neighborhood groups (may include fatherhood and strengthening families initiatives)	**43%**				[REQUIRED Narrative, 2500 characters] Please describe here or attach additional information.
g. State charity tax credits	**0%**				[Narrative, 2500 characters]
h. Other activities, specify_____	**0%**				[Narrative, 2500 characters]
Totals	**$0**	**100%**			

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7.10. Indicate the types of organizations to which the State plans to allocate CSBG remainder/discretionary funds (by grant or contract) to carry out the activities in Table 7.10. [Check all that apply and narrative where applicable]

- ☒ CSBG eligible entities (if checked, include the expected number of CSBG eligible entities to receive funds) ____**6**_____
- ☐ Other community-based organizations
- ☐ State Community Action association
- ☐ Regional CSBG technical assistance provider(s)
- ☒ National technical assistance provider(s)
- ☒ Individual consultant(s)
- ☐ Tribes and Tribal Organizations
- ☐ Other _____
- ☐ None (the State will carry out activities directly)

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

7.11. Performance Management Adjustment: How is the State adjusting the use of remainder/discretionary funds under this State Plan as compared to past plans? Any adjustment should be based on the State's analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources. If the State is not making any adjustments, please explain.

The state association, Mississippi Association of Community Action Agencies, will not be funded for 2017 but the State will award those funds to community action agencies directly for activities serving low-income individuals.

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

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SECTION 8
State Training and Technical Assistance Plan

8.1. Describe the State's plan for delivering CSBG funded training and technical assistance to eligible entities under this State plan. (CSBG funding used for this activity is referenced under Item 7.10(a), Use of Remainder/Discretionary Funds).

Note: This information is associated with State Accountability Measure 3Sc; this response may pre-populate the State's annual report form.

Training and Technical Assistance			
Fiscal Year (Y) Quarter (Q) / Timeframe	Training, Technical Assistance, or Both	Topic	Brief Description of "Other"
Dropdown options: • FY1 – Q1 • FY1 – Q2 • FY1 – Q3 • FY1 – Q4 • FY2 – Q1 • FY2 – Q2 • FY2 – Q3 • FY2 – Q4 • **Ongoing / Multiple Quarters** • All quarters	Toggle Options: • Training • Technical Assistance • **Both**	Dropdown Options: • **Fiscal** • **Organizational Standards – General** • **Organizational Standards – for eligible entities with unmet standards on Technical Assistance Plans (TAPs) or Quality Improvement Plans (QIPs)** • **Correcting Significant Deficiencies Among Eligible Entities** • **Reporting** • **ROMA** • **Community Assessment** • **Strategic Planning** • **Monitoring** • Communication • **Technology** • Other	[Narrative, 2500 characters] If "Other" is selected in column 3, describe in this column
ADD a ROW function Note: Rows will be able to be added for each additional training			

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8.1a. The planned budget for the training and technical assistance plan (as indicated in the Remainder/Discretionary Funds table in item 7.9): _____ [Prepopulated with the budget allocation for years one and two under 7.9a]

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

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

☒ Yes ☐ No

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

The state will develop a TAP and require the agencies to respond within thirty days. The state will provide Training and Technical Assistance to challenging agencies and give opportunities to make correct deficiencies before a TAP is required.

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

☒ CSBG eligible entities (if checked, provide the expected number of CSBG eligible entities to receive funds) [Narrative, 2500 characters]
☐ Other community-based organizations
☒ State Community Action association
☒ Regional CSBG technical assistance provider(s)
☒ National technical assistance provider(s)
☒ Individual consultant(s)
☐ Tribes and Tribal Organizations
☐ Other [Narrative, 2500 characters]

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

8.4. Performance Management Adjustment: How is the State adjusting the training and technical assistance plan under this State Plan as compared to past plans? Any adjustment should be based on the State's analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources. If the State is not making any adjustments, please explain.

We will, as part of our T&TA visit, work to help agencies achieve accountability and results, work with agencies on org standards and develop a plan to implement.

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Training will be planned based on observation from the T&TA visit for the areas where improvement is needed.

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

SECTION 9
State Linkages and Communication

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

9.1. State-level Linkages and Coordination at the State Level: Indicate the linkages and coordination at the State level that the State plans to create or maintain to ensure increased access to CSBG services to low-income people and communities under this State plan and avoid duplication of services, as described under 675C(b)(1)(B) and as required by the assurance under Section 676(b)(5) of the CSBG Act. Please attach additional information as needed. (CSBG funding used for this activity is referenced under Item 7.10(b), Use of Remainder/Discretionary Funds). [Check all that apply]

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

- ☒ State Low Income Home Energy Assistance Program (LIHEAP) office
- ☒ State Weatherization office
- ☒ State Temporary Assistance for Needy Families (TANF) office
- ☒ State Head Start office
- ☐ State public health office
- ☐ State education department
- ☒ State Workforce Innovation and Opportunity Act (WIOA) agency
- ☒ State budget office
- ☒ Supplemental Nutrition Assistance Program (SNAP)
- ☒ State child welfare office
- ☐ State housing office
- ☒ Other **Internal Revenue Service**

9.2. State Linkages and Coordination at the Local Level: Describe the linkages and coordination at the local level that the State and eligible entities plan to create or maintain to ensure increased access to CSBG services to low-income people and communities and avoid duplication of services, as described under 675C(b)(1)(B) and as required by the assurance under Section 676(b)(5) of the CSBG Act. Please attach additional information as needed. (CSBG funding used for this activity is referenced under Item 7.10(b), Use of Remainder/Discretionary Funds.)

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Community action entities are required to develop partnerships and pool resources with social service providers, local and religious organizations and governments to grow the quantity, 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.

9.3. Eligible Entity Linkages and Coordination

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

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 families 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. It is a requirement for each CAA to address linkages and referrals as a part of their Community Action Plan.

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

9.3b State Assurance of Eligible Entity Linkages to Fill Service Gaps: Describe how the eligible entities will develop linkages to fill identified gaps in the services, through the provision of information, referrals, case management, and follow-up consultations, according to the assurance under Section 676(b)(3)(B) of the CSBG Act.

Community action entities are required to develop partnerships and pool resources with social service providers, local and religious organizations and governments to grow the quantity, quality of support and opportunities that are available for those impacted by poverty.

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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. Also, pool resources within the communities at the state and local level.

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

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

☒ Yes ☐ No

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

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

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.

9.4b. If the State selected "no" under item 9.4, describe the coordination of employment and training activities, as defined in Section 3 of WIOA, by the State and by eligible entities providing activities through the WIOA system.

9.5. Emergency Energy Crisis Intervention: Describe how the State will assure, where appropriate, that emergency energy crisis intervention programs under title XXVI

(relating to Low-Income Home Energy Assistance) are conducted in each community in the State, as required by the assurance under Section 676(b)(6) of the CSBG Act).

The Mississippi Low-Income Home Energy Assistance Program (LIHEAP) is delivered by all eligible entities. Eligible entities are required, in their annual applications, to describe how they will coordinate with emergency energy crisis intervention programs at the local level.

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.

See Crisis and Emergency Assistance Attachment

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

9.6. State Assurance: Faith-based Organizations, Charitable Groups, Community Organizations: Describe how the State will assure local eligible entities will coordinate and form partnerships with other organizations, including faith-based organizations, charitable groups, and community organizations, according to the State's assurance under Section 676(b)(9) of the CSBG Act.

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. 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 Weatherization service providers, Head Start, WIN Job Center, Community Colleges, local school districts, Area Agencies 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.

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

9.7 Coordination of Eligible Entity 90 Percent Funds with Public/Private Resources: Describe how the eligible entities will coordinate CSBG 90 percent funds with other public and private resources, according to the assurance under Section 676(b)(3)(C) of the CSBG Act.

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 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 2015 CSBG IS Report, Mississippi community action entities leveraged $2,028,650. 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).

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

9.8. Coordination among Eligible Entities and State Community Action Association: Describe State activities for supporting coordination among the eligible entities and the State Community Action Association.

In FFY 2017, a portion of CSBG discretionary resources may be set aside to provide: additional training and technical assistance responsive to the needs of the Mississippi network, for activities supportive of community action entities' on-going development; for quality improvement initiatives, for emergency needs (entity-in-crisis, natural disaster, etc.) and for other state-wide initiatives.

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

Communication Plan			
Topic	Expected Frequency	Format (drop down)	Brief Description of "Other"
Policies, Meetings and Trainings	Dropdown Options: • Daily • Weekly • Twice-Monthly • **Monthly** • Quarterly • Semi-Annually • Annually	Dropdown Options: • Newsletter • **Mailing** • **Meetings/Presentation** • Blog • **Email** • **Website**	**N/A**

Communication Plan			
Topic	Expected Frequency	Format (drop down)	Brief Description of "Other"
	• Other	• Social Media • Other	
ADD a ROW function *Note: As many rows that are needed will be able to be added*			

9.10. Feedback to Eligible Entities and State Community Action Association: Describe how the State will provide feedback to local entities and State Community Action Associations regarding performance on State Accountability Measures

Communication in the form of a letter will be sent and a response should be submitted within thirty (30) days. Other platforms may be used such as Smartsheet, emails and other multi-media to disseminate information.

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

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

9.11. Performance Management Adjustment: How is the State adjusting the Communication plan in this State Plan as compared to past plans? Any adjustment should be based on the State's analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the State is not making any adjustments, provide further detail.

Smartsheet and Virtual ROMA is utilized to provide information and communication.

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

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SECTION 10
Fiscal Controls and Monitoring

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

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

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

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

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

CSBG Eligible Entity	Review Type	Target Date	Date of Last Full Onsite Review (if applicable)
See Attachment	Dropdown Options: **Other [See Attachment]**	Dropdown Options: **FY1 Q2** **FY1 Q3** **FY1 Q4** **FY2 Q1**	**See Attachment**

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

See Attachment

10.3. Initial Monitoring Reports: According to the State's procedures, by how many calendar days must the State disseminate initial monitoring reports to local entities?

30 days

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

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

10.4. Closing Findings: Are State procedures for addressing eligible entity deficiencies and documenting closure of findings included in the State monitoring protocols attached above?

☒ Yes ☐ No

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10.4a. If you selected "no," please describe State procedures for addressing eligible entity deficiencies and documenting closure of findings. [Narrative Response, 2500 characters]

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

0

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

10.6. Reporting of QIPs: Describe the State's process for reporting eligible entities on QIPs to the Office of Community Services within 30 calendar days of the State approving a QIP?

The State will notify the Office of Community Services of serious deficiencies of an eligible entity. A report will be given to OCS monthly as to the actions and technical assistance provided by the State. If a QIP is requested, OCS will be notified of the due date, and the State's approval or denial of the QIP within 30 days.

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

10.7. Assurance on Funding Reduction or Termination: Does the State assure, according to Section 676(b)(8), that "any eligible entity that received CSBG funding the previous fiscal year will not have its funding terminated or reduced below the proportional share of funding the entity received in the previous fiscal year unless, after providing notice and an opportunity for a hearing on the record, the State determines that cause exists for such termination or such reduction, subject to review by the Secretary as provided in Section 678C(b)."

☒ Yes ☐ No

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

<u>Policies on Eligible Entity Designation, De-designation, and Re-designation</u>

10.8. Does the State CSBG statute and/or regulations provide for the designation of new eligible entities?

☐ Yes ☒ No

10.8a. If yes, provide the citation(s) of the law and/or regulation. If no, describe State procedures for the designation of new eligible entities. [Narrative, 2500 Characters]

10.9. Does the State CSBG statute and/or regulations provide for de-designation of eligible entities?

☐ Yes ☒ No

10.9a. If yes, provide the citation(s) of the law and/or regulation. If no, describe State procedures for de-designation of new eligible entities. [Narrative, 2500 Characters]

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The State will establish procedures for de-designation of new eligible entities with the assistance of SEETAS.

10.10. Does the State CSBG statute and/or regulations specify a process the State CSBG agency must follow to re-designate an existing eligible entity?

☐ Yes ☒ No

10.10a. If yes, provide the citation(s) of the law and/or regulation. **If no, describe State procedures for re-designation of existing eligible entities. [Narrative, 2500 Characters**]

The State will establish procedures for re-designation of existing eligible entities with the assistance of SEETAS.

Fiscal Controls and Audits and Cooperation Assurance

10.11. Fiscal Controls and Accounting: Describe how the State's fiscal controls and accounting procedures will a) permit preparation of the SF-425 Federal fiscal reports (FFR) and b) permit the tracing of expenditures adequate to ensure funds have been used appropriately under the block grant, as required by Block Grant regulations applicable to CSBG at 45 CFR 96.30(a).

The State requires all local Subgrantees requesting CSBG funds to submit Monthly Reporting Worksheets. These Reporting Worksheets show expenditures such as Case Management, Supportive Services and Administration. They also show expenditures by cost category and line items. Documentation from Virtual ROMA will be required to support costs reflected on Reporting Worksheets and Requests for Cash as a means to adhere to mandates by DPI to monitor costs reported for the month. Also, Requests for Cash are submitted based on current needs. Federal funds made available to the State under this title will disburse administrative and programmatic funds to local Subgrantees in accordance with the CSBG Statute, and the overall contractual allocation for each subgrantee regulates the maximum allowable expenditures. Procedural manuals are in place which covers a range of fiscal and accounting rules and regulations with which Subgrantees must comply. Also, to further account for CSBG federal funds, 16 of 17 DCS Subgrantees use the same accounting software, GMS, which allows tracking through Virtual ROMA. It allows easy access in training new personnel, as well as existing personnel in the effective use of the GMS software and DCS requirements.

Local subgrantees are required to have and submit an annual audit performed annually by an independent Certified Public Accountant. Also, the State complies with the Single Audit Act requirement.

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Subgrants will be monitored annually by the Division of Program Integrity. Periodic reviews to the subgrantee, both announced and unannounced will be conducted by the Division of Community Services.

The State continuously provides training and technical assistance to the subgrantees on program and fiscal management to enhance program compliance and quality service delivery to eligible households. DCS program and fiscal staff also conduct special training targeted at new subgrantee staff to ensure program compliance.

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

See Attachment

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

10.13. Assurance on Federal Investigations: Will the State "permit and cooperate with Federal investigations undertaken in accordance with Section 678D" of the CSBG Act, as required by the assurance under Section 676(b)(7) of the CSBG Act?

☒ Yes ☐ No

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

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

10.14. Performance Management Adjustment: How is the State adjusting monitoring procedures in this State Plan as compared to past plans? Any adjustment should be based on the State's analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If this State is not making any adjustments, provide further detail.

The State has included organizational standards in the monitoring tool and the Training and Technical Assistance tool

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

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

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SECTION 11

Eligible Entity Tripartite Board

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

- ☒ Attend Board meetings
- ☒ Review copies of Board meeting minutes
- ☒ Track Board vacancies/composition
- ☒ Other **Provide Board Training**

11.2. How often does the State require eligible entities to provide updates (e.g., copies of meeting minutes, vacancy alerts, changes to bylaws, low-income member selection process, etc.) regarding their Tripartite Boards? This does not apply to those entities under a Corrective Action Plan or Quality Improvement Plan. **[Check all that apply]**

- ☒ Annually
- ☐ Biannually
- ☒ Quarterly
- ☒ Monthly

11.3. Assurance on Eligible Entity Tripartite Board Representation: Describe how the State will carry out the assurance under Section 676(b)(10) of the Act that the State will require eligible entities to have policies and procedures by which individuals or organizations can petition for adequate representation on an eligible entities' Tripartite Board.

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 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.

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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.

11.4. Does the State permit public eligible entities to use, as an alternative to a Tripartite Board, "another mechanism specified by the State to assure decision-making and participation by low-income individuals in the development, planning, implementation, and evaluation of programs" as allowed under Section 676B(b)(2) of the CSBG Act.

☐ Yes ☒ No

11.4a. If yes, describe the mechanism used by public eligible entities as an alternative to a Tripartite Board. [Narrative, 2500 Characters]

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Section 12
Individual and Community Eligibility Requirements

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

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

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

Each applicant household requesting assistance must complete an application to determine eligibility. The application process involves a case management approach. This approach is an interaction between the client and a caseworker/manager. During the interaction process caseworker/case manager obtains vital information about social and economic conditions of the entire household. This process assists in identifying households' needs. It also helps to identify those households that are at risk or in crisis so that a service plan can be developed to assist these households to become stable and self-reliant. Elderly and disabled are not required to participate in case management. Our policy requires an earlier appointment date for vulnerable households. Income eligibility is set at or below 125% of the poverty line that are in effect at the time of submission of the application. An application is taken on the applicant household by the local subgrantee agencies. All applications must be entered in the Virtual ROMA system.

12.2. Income eligibility for general/short term services: For services with limited in-take procedures (where individual income verification is not possible or practical), how do eligible entities generally verify income eligibility for services? An example of these services is emergency food assistance.

The eligible entities provide referral and outreach to those communities that are known to be low-income. Low-Income clients are notified so that eligible entity has documentation in the Virtual ROMA system of their eligibility. The workgroup to address natural disasters.

12.3. Community-targeted services: For services that provide a community-wide benefit (e.g., development of community assets/facilities; building partnerships with other organizations), how do eligible entities ensure the services target low-income communities?

Eligible entities ask for participation and partnership from other service providers and organizations that provide services to the low-income community. Low-income clients are also asked to participate in the meetings/events.

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SECTION 13
Results Oriented Management and Accountability System (ROMA)

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

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

☒ The Results Oriented Management and Accountability (ROMA) System
☐ Another performance management system developed pursuant to section 678E(b) of the CSBG Act
☐ An alternative system for measuring performance and results

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

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 national 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.

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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.

13.1b. If you did not select ROMA above, please describe the system the State will use for performance measurement.

N/A

13.2. Indicate and describe the outcome measures the State will use to measure eligible entity performance in promoting self-sufficiency, family stability, and community revitalization (as required under Section 676(b)(12) of the CSBG Act)? [Select one and provide narrative]

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

☐ CSBG National Performance Indicators (NPIs)
☒ NPIs and others **<u>Organizational standards</u>**
☐ Others

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

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

The eligible entities utilize Results Oriented Management Accountability as a framework for implementing case management and agency accountability. Virtual ROMA is utilized state-wide to capture data. Additionally, the state provides T&TA on the Virtual ROMA and ROMA goals. The state is working with eligible entities to increase the number of ROMA Certified trainers in the state.

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

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

As part of the Notice of Funding Availability (NOFA), the State requires eligible entities to conduct a Community Strengths and Needs Assessment. The data collected is used to submit what services the entity will provide to the low-income population for that program year. Also, entities can pull reports from the Virtual ROMA system on services provided and use this data to plan services for the next program year.

<u>Community Action Plans and Needs Assessments</u>

13.5. Describe how the State will secure a Community Action Plan from each eligible entity, as a condition of receipt of CSBG funding by each entity, as required by Section 676(b)(11) of the CSBG Act.

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.

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

13.6. State Assurance: Describe how the State will assure that each eligible entity includes a community needs assessment for the community served (which may be coordinated with community needs assessments conducted by other programs) in each entity's Community Action Plan, as required by Section 676(b)(11) of the CSBG Act.

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 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.**

f) **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.**

g) **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.**

h) **An updated Board of Directors roster.**

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

SECTION 14

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

14.1 Use of Funds Supporting Local Activities

CSBG Services

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

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

(i) to remove obstacles and solve problems that block the achievement of self-sufficiency (particularly for families and individuals who are attempting to transition off a State program carried out under part A of title IV of the Social Security Act);

(ii) to secure and retain meaningful employment;

(iii) to attain an adequate education with particular attention toward improving literacy skills of the low-income families in the community, which may include family literacy initiatives;

(iv) to make better use of available income;

(v) to obtain and maintain adequate housing and a suitable living environment;

(vi) to obtain emergency assistance through loans, grants, or other means to meet immediate and urgent individual and family needs;

(vii) to achieve greater participation in the affairs of the communities involved, including the development of public and private grassroots partnerships with local law enforcement agencies, local housing authorities, private foundations, and other public and private partners to –

(I) document best practices based on successful grassroots intervention in urban areas, to develop methodologies for widespread replication; and

(II) strengthen and improve relationships with local law enforcement agencies, which may include participation in activities such as neighborhood or community policing efforts;

MDHS-DCS will ensure compliance with this assurance through the state's seventeen (17) eligible entities. Eligible entities will satisfy these Assurances through activities such as disaster assistance and relief, job training, educational support, career development, volunteer efforts, food support, health education and access, tax preparation assistance, mentoring, parenting development, child care services and other activities. DCS will ensure that these activities are carried out through review of the

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CSBG eligible entities' program performance and enforcement of contract requirements.

Program Areas/Activities offered by individual grantees include:

1. **Early Childhood Programs: Programs and activities designed to assist low-income children/individuals attain an adequate education, enhance their education, or augment the learning process.**
    a. **Child care provided or referrals to child care services- 10 entities**
    b. **Early Head Start- 5 entities**
    c. **Head Start- 9 entities**

2. **Economic Development/Education: Programs and activities designed to assist, support, operate, or provide technical assistance to expand the low-income community's economic base.**
    a. **Business Development- 1 entity**
    b. **General Equivalency Diploma (GED) Class- 4 entities**
    c. **Workforce Investment Act (WIA)- 6 entities**
    d. **Other DOL employment and training programs- 1 entity**
    e. **Referrals to General Equivalency Diploma (GED) classes- 6 entities**

3. **Emergency Services: Programs and activities designed to meet immediate and urgent needs of low-income individuals and families.**
    a. **Clothing Pantry referrals- 14 entities**
    b. **Domestic Violence Victim Support/Shelter- 2 entities**
    c. **Referrals to Domestic Violence Victim Support/Shelter- 1 entity**
    d. **Emergency Home Repairs- 3 entities**
    e. **Food Pantry referrals- 18 entities**
    f. **Utility Payment Assistance- 18 entities**
    g. **Gasoline Vouchers- 4 entities**
    h. **Referrals for Salvation Army Power of Care- 1 entity**
    i. **Sharing Your Warmth Atmos Funds- 2 entities**
    j. **CITGO CFL Energy Efficient Light Bulbs- 1 entity**
    k. **City of Jackson Emergency Water Bill Assistance- 1 entity**

4. **Housing: Programs and activities designed to assist low-income individuals attain and maintain safe, adequate, and affordable housing.**
    a. **Referrals to Housing Counseling and Homeownership programs- 7 entities**
    b. **Homeless Supportive Services- 8 entities**
    c. **Rent Payment Assistance- 16 entities**
    d. **Temporary Housing- 5 entities**
    e. **Mortgage Payment Assistance- 12 entities**
    f. **Emergency Shelter Grant Program (ESGP)- 3 entities**
    g. **Multi-Family Housing Development- 2 entities**
    h. **Owner-Occupied Rehabilitation- 2 entities**
    i. **LIHEAP Weatherization/Weatherization- 6 entities**
    j. **Section 8 Rental Assistance Program- 2 entities**
    k. **Rentals- 5 entities**
    l. **Homebuyer Certification- 1 entity**

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m. **Foreclosure Counseling- 1 entity**

5. **Income Management: Programs and activities to help individuals manage their money to meet essential household needs and expenses.**
    a. **Budget Counseling/Referrals- 17 entities**
    b. **Earned Income Tax Credit Assistance- 18 entities**
    c. **Referrals to Individual Development Accounts Program- 3 entities**
    d. **Credit Counseling- 1 entity**

6. **Nutrition & Health Programs: Programs and activities that provide access to healthy meals, nutrition education and nutrition counseling.**
    a. **Child & Adult Care Food Programs- 6 entities**
    b. **Group Meal Sites- 6 entities**
    c. **Garden Seed Distribution- 1 entity**
    d. **Heartland Share, Food Vouchers, Food Baskets- 1 entity**
    e. **Meal Delivery to Residence- 8 entities**
    f. **Summer Feeding Program- 3 entities**
    g. **Other USDA Food Programs- 3 entities**
    h. **Prescription/Medical Assistance- 13 entities**
    i. **Health Care Clinics/Referrals- 11 entities**
    j. **Vision Service Plan (Mobile Eyes Program)- 1 entity**

7. **Independent Living/Aging Programs: Programs and activities to support independence in special-needs populations.**
    a. **Foster Grandparents- 2 entities**
    b. **Retired and Senior Volunter Program- 4 entities**
    c. **Medicare/Medicaid- 2 entities**
    d. **Older Americans Act- 3 entities**
    e. **Family Caregiver/ In-Home Care- 2 entities**
    f. **SafeLink Wireless- 2 entities**

8. **Transportation: Programs help people gain access to transportation services when they do not have access to a vehicle.**
    a. **Pick Up Provided in Response to Request- 6 entities**
    b. **Transportation to jobs- 5 entities**
    c. **Non-Emergency for Medicaid Recipients- 2 entities**
    d. **To Group Meal Sites, Head Start Centers and Shopping- 5 entities**
    e. **Rural Outreach for CSBG/LIHEAP- 1 entity**
    f. **Transportation for Elderly and Disabled- 1 entity**

9. **Community Improvement/Quality of Life: Programs and activities that improve or enhance the quality of life and improve the safety and stability of the low-income community and vulnerable populations.**
    a. **Drug/Alcohol Abuse Counseling- 1 entity**
    b. **Referrals to Drug/Alcohol Abuse Counseling- 1 entity**
10. **Youth Programs: Programs and activities designed to assist low-income children/individuals attain an adequate education, enhance their education, or augment the learning process.**

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a. **Youthful Offenders Intervention- 3 entities**
b. **Mentoring/Tutoring- 5 entities**
c. **Provide School Supplies/Referrals- 9 entities**
d. **Summer Youth Programs (Reading, Sports, Nutrition)- 5 entities**
e. **Employment Programs- 3 entities**
f. **Referral to After-school Mentoring/Tutoring Program- 4 entities**
g. **Adolescent Offender Program- 1 entity**

11. **Employment: Programs and activities designed to help low-income individuals secure and retain meaningful employment.**
    a. **Job Training- 3 entities**
    b. **Referrals to Job Training Programs- 7 entities**

Needs of Youth

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

(B) to address the needs of youth in low-income communities through youth development programs that support the primary role of the family, give priority to the prevention of youth problems and crime, and promote increased community coordination and collaboration in meeting the needs of youth, and support development and expansion of innovative community-based youth development programs that have demonstrated success in preventing or reducing youth crime, such as--

(i) programs for the establishment of violence-free zones that would involve youth development and intervention models (such as models involving youth mediation, youth mentoring, life skills training, job creation, and entrepreneurship programs); and

(ii) after-school child care programs;

MDHS—DCS will ensure compliance with this assurance by making funds available to eligible entities to conduct after school tutorial programs, summer programs, year round educational programs and activities, and summer reading programs for youth. These programs will promote educational excellence and youth development which prevents youth problems and crime. Support will also be given to eligible families of the participants to ensure family needs are met through the case management process, referrals made on behalf of family to other local providers.

Coordination of Other Programs

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

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

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MDHS-DCS will ensure compliance with this Assurance through its partnerships with the State's seventeen (17) eligible entities. Importantly, these partnerships and the subsequent provision of CSBG funding, allows each entity to execute their respective community action plan.

MDHS-DCS requires the eligible entities to submit a Service Delivery Plan. The Plan is the vehicle by which the entities 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.

To ensure the effectiveness and avoid duplication of services, we will partner with other agencies to provide seamless services.

<u>State Use of Discretionary Funds</u>

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

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

MDHS-DCS will allocate at least 5 percent of CSBG funds received by the State for FFY 2017 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 organizations to assist CAAs with corrective action strategies and; State Training and Technical Assistance.**

3. **Other CSBG purposes- 35%: to include new and existing community projects for seniors and youth.**

In FFY 2017, 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 2017 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 goal**

<u>Eligible Entity Service Delivery, Coordination, and Innovation</u>

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

Eligible Entity Service Delivery System

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

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 achieve outcomes based upon the six national goals. Service delivery systems vary from entity to entity, just as the communities and people served. 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.

Eligible Entity Linkages – Approach to Filling Service Gaps

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

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

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 additional services available within the community.

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

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

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

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

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 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 2015 CSBG IS Report, Mississippi community action entities leveraged $2,028,650. 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).

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

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

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

Eligible entities may use discretionary funds to develop, implement, and/or support initiatives such as Fatherhood, Healthy Marriage and Family Development activities designed to enhance the quality of family life, and strengthen families. Entities are encouraged to partner with other local or state service providers to convene teen, fatherhood and parental summits and trainings as part of family development activities. These activities will facilitate dialogue and provide valuable data for entities to use in planning services and projects to address challenges expressed by the target population.

Eligible Entity Emergency Food and Nutrition Services

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

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 Community Action Plans and 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 Field Operations offices to refer clients 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.

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

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

with entities providing activities through statewide and local workforce development systems under such Act."

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

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 WIOA. Additionally, MDHS-DCS will maintain a relationship with statewide WIOA and will be available to represent CSBG in those settings.

State Coordination/Linkages and Low-income Home Energy Assistance

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

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

All Mississippi eligible entities administer the Low-Income Home Energy Assistance program. 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.

Federal Investigations

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

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

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

Funding Reduction or Termination

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

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

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.

<u>Coordination with Faith-based Organizations, Charitable Groups, Community Organizations</u>

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

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

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/ 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.

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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 Agencies 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.

Eligible Entity Tripartite Board Representation

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

Note: the State describes this assurance in the Eligible Entity Tripartite Board section, 11.3**.**

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 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.

Eligible Entity Community Action Plans and Community Needs Assessments

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

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 which indicate 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 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.

f) 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.

g) 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.

h) An updated board of director's roster.

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State and Eligible Entity Performance Measurement: ROMA or Alternate system

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

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

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 national 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.

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.

<u>Validation for CSBG Eligible Entity Programmatic Narrative Sections</u>

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

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

[No response for this item]

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

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SECTION 15
Federal Certifications

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

15.1 Lobbying

Certification for Contracts, Grants, Loans, and Cooperative Agreements

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

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or

an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

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

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

Statement for Loan Guarantees and Loan Insurance

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

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

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

_____ _____

John Davis, Executive Director
Mississippi Department of Human Services

Date

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15.2 Drug-Free Workplace Requirements

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

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

(1) By signing and/or submitting this application or grant agreement, the grantee is providing the certification set out below.

(2) The certification set out below is a material representation of fact upon which reliance is placed when the agency awards the grant. If it is later determined that the grantee

knowingly rendered a false certification, or otherwise violates the requirements of the Drug-Free Workplace Act, the agency, in addition to any other remedies available to the Federal Government, may take action authorized under the Drug-Free Workplace Act.

(3) For grantees other than individuals, Alternate I applies.

(4) For grantees who are individuals, Alternate II applies.

(5) Workplaces under grants, for grantees other than individuals, need to be identified on the certification. If known, they may be identified in the grant application. If the grantee does not identify the workplaces at the time of application, or upon award, if there is no application, the grantee must keep the identity of the workplace(s) on file in its office and make the information available for Federal inspection. Failure to identify all known workplaces constitutes a violation of the grantee's drug-free workplace requirements.

(6) Workplace identifications must include the actual address of buildings (or parts of buildings) or other sites where work under the grant takes place. Categorical descriptions may be used (e.g., all vehicles of a mass transit authority or State highway department while in operation, State employees in each local unemployment office, performers in concert halls or radio studios).

(7) If the workplace identified to the agency changes during the performance of the grant, the grantee shall inform the agency of the change(s), if it previously identified the workplaces in question (see paragraph five).

(8) Definitions of terms in the Nonprocurement Suspension and Debarment common rule and Drug-Free Workplace common rule apply to this certification. Grantees' attention is called, in particular, to the following definitions from these rules:

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

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

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

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

Certification Regarding Drug-Free Workplace Requirements

Alternate I. (Grantees Other Than Individuals)

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

(a) Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;

(b) Establishing an ongoing drug-free awareness program to inform employees about - -

(1) The dangers of drug abuse in the workplace;

(2) The grantee's policy of maintaining a drug-free workplace;

(3) Any available drug counseling, rehabilitation, and employee assistance programs; and

(4) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;

(c) Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph (a);

(d) Notifying the employee in the statement required by paragraph (a) that, as a condition of employment under the grant, the employee will - -

(1) Abide by the terms of the statement; and

(2) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;

(e) Notifying the agency in writing, within 10 calendar days after receiving notice under paragraph (d)(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;

(f) Taking one of the following actions, within 30 calendar days of receiving notice under paragraph (d)(2), with respect to any employee who is so convicted - -

(1) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or

(2) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;

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(g) Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs (a), (b), (c), (d), (e) and (f).

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

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

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]

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

_____ _____

John Davis, Executive Director Date
Mississippi Department of Human Services

15.3 Debarment

CERTIFICATION REGARDING DEBARMENT, SUSPENSION AND OTHER RESPONSIBILITY MATTERS

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

Primary Covered Transactions

Instructions for Certification

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

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

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

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

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

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

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

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

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

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

****

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

Primary Covered Transactions

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

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

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

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

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

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

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

Instructions for Certification

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

(2) The certification in this clause is a material representation of fact upon which reliance was

(3) placed when this transaction was entered into. If it is later determined that the prospective lower tier participant knowingly rendered an erroneous certification, in addition to other remedies available to the Federal Government the department or agency with which this transaction originated may pursue available remedies, including suspension and/or debarment.

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

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

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

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

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

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

(10) Except for transactions authorized under paragraph five of these instructions, if a participant in a covered transaction knowingly enters into a lower tier covered transaction

with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, suspended, debarred, ineligible, or voluntarily excluded from participation in this transaction, in addition to other remedies available to the Federal Government, the department or agency with which this transaction originated may pursue available remedies, including suspension and/or debarment.

****

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

(1) The prospective lower tier participant certifies, by submission of this proposal, that neither it nor its principals is presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from participation in this transaction by any Federal department or agency.

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

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

_____ _____

John Davis, Executive Director
Mississippi Department of Human Services

Date

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15.4 Environmental Tobacco Smoke

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

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

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

_____ _____

John Davis, Executive Director
Mississippi Department of Human Services

Date

ATTACHMENTS

ATTACHMENT-LETTER OF DESIGNATION

PHIL BRYANT
GOVERNOR

March 17, 2016

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., 5th Floor, West
Washington, D.C. 20447

Dear Ms. Chaffin:

I hereby authorize Mr. John Davis, 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. Davis to sign all assurances for the Community Services Block Grant and Low-Income Home Energy Assistance Program (LIHEAP) grant applications outlined in the respective statute, as amended. To comply with the LIHEAP stature, Mr. Davis 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.

Should you need additional information, please contact Mr. Davis at (601)359-4457 or Post Office Box 352, Jackson, Mississippi 39205.

Sincerely,

Phil Bryant
GOVERNOR

PB:JD:tr

cc: Mr. John Davis

STATE OF MISSISSIPPI • OFFICE OF THE GOVERNOR
POST OFFICE BOX 139 • JACKSON, MISSISSIPPI 39205 • TELEPHONE: (601) 359-3150 • FAX: (601) 359-3741 • www.governorbryant.com

ATTACHMENT-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 2017 programs is scheduled for Tuesday, June 28, 2016, at 9:00 a.m. in the new Training Room at the Mississippi Department of Human Services, 750 North State Street, 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 2017, 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 2017, 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 plans and/or eligibility requirements must be received on or before July 5, 2016 by the Division of Community Services, P. O. Box 352, Jackson, Mississippi 39205. Public comments will be reviewed before finalizing the 2017 State Plans for these programs.

DIVISION OF COMMUNITY SERVICES
MEMORANDUM

TO: Katrina Smith, Director
Office of Accounting

FROM: Nicole McBeath
Division of Community Services

DATE: May 11, 2016

SUBJECT: Publication of Legal Notice

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 June 14, 2016 and June 21, 2016 and should appear one time in each newspaper. **Please send us the copies of the newspaper advertisements from <u>three</u> 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

ATTACHMENT-ELIGIBLE ENTITIES

AJFC **(Nonprofit)**
P.O. Box 3011
1038 N. Union, Bldg A.
Natchez, MS 39120
(601) 442-8681 or 1-866-243-0041
Fax (601) 442-9572
Executive Director: Sandra Sewell

Adams, Claiborne, Copiah, Franklin, Jefferson, Lawrence and Lincoln

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Bolivar County **(Nonprofit)**
810 East Sunflower Road
Suite 120
Cleveland, MS 38732
(662) 846-1491
Fax (662) 283-2352
Interim Executive Director: Elnora Littleton

Bolivar

Central Mississippi, Inc. **(Nonprofit)**
P.O. Box 749
101 South Central Ave.
Winona, MS 38967
(662) 283-4781 or 1-800-898-0410
Fax (662)283-2352
Executive Director: Pamela Gary

Attala, Carroll, Grenada, Holmes, Leflore, Montgomery and Yalobusha

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Coahoma Opportunities, Inc. **(Nonprofit)**
115 Issaquena Ave.
Clarksdale, MS 38614
(662) 624-4887
Fax (662)624-4915
Executive Director: Edward Seals

Coahoma

Hinds County Human Resource Agency **(Public)**
P.O. Box 22657
258 Maddox Road
Jackson, MS 39212
(601) 923-3930
Fax (601)923-3925
President/CEO: Kenn Cockrell

Hinds

Jackson County CAA **(Nonprofit)**
P.O. Box 8723
5343 Jefferson Street
Moss Point, MS 39562
(228) 769-3292 or 1-866-255-9987
Fax (228)769-3264
Executive Director: Diann Payne

Harrison, George, and Jackson

LIFT, Incorporated **(Nonprofit)**
2577 McCullough Blvd.
Belden, MS 38826
(662) 842-9511 or 1-800-844-5438
Fax (662)842-5575
Executive Director: Dorothy Leasy

Calhoun, Chickasaw, Itawamba, Lafayette, Lee, Monroe, Pontotoc and Union

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Mid-State Opportunities Inc. **(Nonprofit)**
P.O. Box 270
204 North Church Street
Charleston, MS 38921
(662) 647-2463 or 1-800-523-6683
Fax (662)647-5868
Executive Director: Lynda Bradford

Panola, Quitman, Tallahatchie, Tunica, Tate and Desoto

Multi-County CSA **(Nonprofit)**
P.O. Box 905
2590 Sellers Drive
Meridian, MS 39302
(601) 483-4838 or 1-800-898-0659
Fax (601)428-9861
Executive Director: Ronald Collier

Clarke, Jasper, Kemper, Lauderdale, Neshoba, Newton, Scott, Smith and Wayne

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Northeast MS CS **(Nonprofit)**
P.O. Box 930
801 Hatchie Street
Booneville, MS 38829
(662) 728-2118 or 1-877-728-2118
Fax (662)728-8720
Executive Director: Steve Gaines

Alcorn, Marshall, Prentiss, Tishomingo

PRVO **(Nonprofit)**
P.O. Box 188
756 Hwy. 98 Bypass
Columbia, MS 39429
(601) 736-9564 or 1-866-736-9564
Fax (601)736-6288
Executive Director: Helmon Johnson

Covington, Greene, Hancock, Forrest, Jefferson Davis, Lamar, Marion, Pearl River, Jones, Perry, and Stone

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Prairie Opportunity **(Nonprofit)**
501 Hwy. 12 West
Suite 110
Starkville, MS 39759
(662) 323-3397 or 1-888-397-5550
Fax (662)323-8754
Executive Director: Laura Marshall

Choctaw, Clay, Leake, Lowndes, Noxubee, Oktibbeha, Webster and Winston

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South Central Community Action Agency **(Nonprofit)**
P.O. Box 129
110 Forth Street
D'Lo, MS 39062
(601) 847-5552
Fax (601)847-5589
Executive Director: Sheletta Buckley

Madison, Rankin and Simpson

Southwest Mississippi Opportunities **(Nonprofit)**
P.O. Box 1667
223 3rd Street
McComb, MS 39648
(601) 684-5593 or 1-800-250-7730
Fax (601)249-3996
Executive Director: William Franklin

Amite, Pike, Walthall and Wilkinson

Sunflower-Humphreys **(Nonprofit)**
P.O. Box 908
414 Martin Luther King Dr.
Indianola, MS 38751
(662) 887-5655 or 1-888-677-1461
Fax (662)887-4888
Executive Director: Louise Bradford

Humphreys and Sunflower

United CAA **(Nonprofit)**
P.O. Box 338
380 Ripley Avenue
Ashland, MS 38603
(662) 224-8912 or 1-888-744-4407
Fax (662)224-8142
Executive Director: Willie-Ruth Daugherty

Benton and Tippah

WWISCAA **(Nonprofit)**
P.O. Box 1813
1165 South Raceway Road
Greenville, MS 38702
(662) 378-5857 or 1-800-820-8204
Fax (662)332-5191
Executive Director: Jannis Williams

Issaquena, Sharkey, Warren, Washington and Yazoo

ATTACHMENT- TENTATIVE FFY 2017 ALLOCATIONS

(These levels are dependent on the Federal CSBG award at the FFY 2016 level. Adjustments will be made once the final FFY 2017 awards are known.)

Eligible Entities	Est. Allocation
AJFC CAA	$560,347
Bolivar Co CAA	$229,233
Central Mississippi	$698,906
Coahoma Opportunities	$163,010
Hinds County HRA	$908,782
Jackson Co CAC	$809,957
LIFT	$882,292
Mid-State Opportunities	$647,965
Multi County CSA	$860,897
Northeast MS	$393,262
PRVO	$1,371,323
Prairie Opportunity	$799,769
South Central CAA	$535,896
Southwest MS	$343,340
Sunflower-Humphreys Co	$220,064
United CAA	$121,239
WWISCAA	$641,852
Total	$10,188,134

2017 CSBG Tentative Allocations- June 2016

AJFC CAA

Adams	1.44%	146,709
Claiborne	0.62%	63,166
Copiah	1.10%	112,069
Franklin	0.32%	32,602
Jefferson	0.45%	45,847
Lawrence	0.43%	43,809
Lincoln	1.14%	116,145
Total	5.50%	560,347

Bolivar Co. CAA

Bolivar	2.25%	229,233

Central Mississippi

Attala	0.75%	76,411
Carroll	0.38%	38,715
Grenada	0.89%	90,674
Holmes	1.39%	141,615
Leflore	2.33%	237,384
Montgomery	0.50%	50,941
Yalobusha	0.62%	63,166
Total	6.86%	698,906

Coahoma Opportunities

Coahoma	1.60%	163,010

Hinds County HRA

Hinds	8.92%	908,782

Jackson Co. CAC

Jackson	3.20%	307,237
George	0.44%	44,828
Harrison	4.31%	439,109
Total	7.95%	809,957

LIFT

Calhoun	0.51%	51,959
Chickasaw	0.77%	78,449
Itawamba	0.53%	53,997
Lafayette	1.54%	156,897
Lee	2.50%	254,703
Monroe	1.25%	127,352
Pontotoc	0.77%	78,449
Union	0.79%	80,486
Total	8.66%	882,292

Mid-State Opportunities

Desoto	2.30%	234,327
Panola	1.65%	168,104
Quitman	0.48%	48,903
Tallahatchie	0.68%	69,279
Tate	0.75%	76,411
Tunica	0.50%	50,941
Total	6.36%	647,965

Multi-County CSA

Clarke	0.62%	63,166
Jasper	0.64%	65,204
Kemper	0.37%	37,696
Lauderdale	2.68%	273,042
Newton	0.64%	65,204
Wayne	0.79%	80,486
EC- Neshoba	1.05%	106,975
EC-Scott	1.17%	119,201
EC-Smith	0.49%	49,922
Total	8.45%	860,897

Northeast MS

Alcorn	0.99%	100,863
Marshall	1.29%	131,427
Prentiss	0.89%	90,674
Tishomingo	0.69%	70,298
Total	3.86%	393,262

PRVO

Covington	0.86%	87,618
Forrest	3.20%	326,020
Jeff Davis	0.59%	60,110
Jones	2.60%	263,873
Lamar	1.07%	109,013
Marion	1.06%	107,994
Pearl River	1.95%	198,669
Perry	0.44%	44,828
Greene	0.34%	34,640
Hancock	0.96%	97,806
Stone	0.40%	40,753
Total	13.46%	1,371,323

Prairie Opportunity

Choctaw	0.34%	34,640
Clay	0.82%	83,543
Lowndes	1.99%	202,744
Noxubee	0.63%	64,185
Oktibbeha	2.27%	231,271
Webster	0.41%	41,771
Winston	0.68%	69,279
EC- Leake	0.71%	72,336
Total	7.85%	799,769

South Central CAA

Simpson	1.06%	107,994
Madison	2.03%	206,819
Rankin	2.17%	221,083
Total	5.26%	535,896

Southwest MS

Amite	0.59%	60,110
Pike	1.75%	178,292
Walthall	0.58%	59,091
Wilkinson	0.45%	45,847
Total	3.37%	343,340

Sunflower-Humphreys Co.

Humphreys	0.64%	65,204
Sunflower	1.52%	154,860
Total	2.16%	220,064

United CAA

Benton	0.36%	36,677
Tippah	0.83%	84,562
Total	1.19%	121,239

WWISCAA

Issaquena	0.14%	14,263
Sharkey	0.29%	29,546
Warren	1.52%	154,860
Washington	3.03%	308,700
Yazoo	1.32%	134,483
Total	6.30%	641,852

ATTACHMENT-FISCAL CONTROLS & MONITORING

Tentative 2016 CSBG Monitoring Schedule			
CSBG Eligible Entity	Tentative Review Date		Last Review Date
AJFC Community Action Agency, Inc.	2016-Oct	FY2 Q1	2014-Nov
Bolivar County Community Action Agency, Inc.	2016-Aug	FY1 Q4	2014-Sep
Central Mississippi, Inc.	2016-Jul	FY1 Q4	2014-Aug
Coahoma Opportunities, Inc.	2016-Apr	FY1 Q3	2015-Mar
Gulf Coast Community Action Agency, Inc.	2016-Nov	FY2 Q1	2014-Dec
Hinds County Human Resource Agency, Inc.	2016-Dec	FY2 Q1	2014-Dec
Jackson County Civic Action Committee, Inc.	2016-Sep	FY1 Q4	2014-Oct
LIFT, Inc.	2016-Apr	FY1 Q3	2015-Apr
Mid-State Opportunity, Inc.	2016-Nov	FY2 Q1	2014-Nov
Multi-County Community Service Agency, Inc.	2016-Sep	FY1 Q4	2014-Sep
Northeast MS Community Services, Inc.	2016-Sep	FY1 Q4	2014-Oct
Pearl River Valley Opportunity, Inc.	2016-Oct	FY2 Q1	2014-Oct
Prairie Opportunity, Inc.	2016-Oct	FY2 Q1	2014-Oct
South Central Community Action Agency, Inc.	2016-Apr	FY1 Q3	2015-Apr
Southwest Mississippi Opportunity, Inc.	2016-Sep	FY1 Q4	2014-Sep
Sunflower-Humphreys Counties Progress, Inc.	2016-Oct	FY2 Q1	2014-Dec
United Community Action Committee, Inc.	2016-Dec	FY2 Q1	2014-Dec
Warren-Washington-Issaquena-Sharkey Community Action Agency	2016-May	FY1 Q3	2014-Jan

<u>Per the MDHS Subgrant/Contract Manual</u>

MONITORING

The Mississippi Department of Human Services (MDHS) is required to monitor the activities of its subgrantees by following the Single Audit Act Amendments of 1996, the Office of Management and Budget (OMB) Circular A-133, *Audits of States, Local Governments, and Non-Profit Organizations,* and the OMB Circular A-133 Compliance Supplement. MDHS shall monitor each project, program, subgrant, function, or activity supported by a Federal award to assure compliance with applicable Federal regulations and that performance goals are achieved.

POLICY

MDHS has established uniform monitoring policies designed to ensure that all subgrants under the jurisdiction of MDHS are administered in compliance with Federal requirements and with the terms of the subgrant agreements. Monitoring subgrants, for compliance with the applicable Federal regulations, State laws, Agency policies, and the terms of the subgrant agreements, is the responsibility of the MDHS Division of Program Integrity.

Subgrant monitoring procedures may include several of the various options available. These options include: reviewing reports submitted by the subgrantee; reviewing documentation supporting expenses reported under MDHS subgrants; reviewing the subgrantee‟s single audit or program-specific audit results and evaluating audit findings and the subgrantee‟s corrective action plan; performing on-site reviews of fiscal and programmatic records and observing subgrantee operations; and/or, arranging for limited scope audits of specific compliance areas.

Planning Considerations

When determining the extent of monitoring procedures to perform, MDHS will consider factors such as the amount of the subgrant, the percentage of a Federal program’s total funds awarded to subgrantees, and the complexity of the compliance requirements. To determine the appropriateness of monitoring procedures, MDHS will consider the cost-effectiveness of monitoring procedures compared to the relative size and complexity of the Federal awards administered by the subgrantee. The following factors will also be considered when determining the monitoring procedures to be performed to ensure compliance with the Federal regulations, State laws, Agency policies and procedures, and the terms of the subgrant agreement:

1. The amount of the subgrant in relation to the total amount of the program;

2. Prior experience of the subgrantee operating subgrants supported by Federal funds;

3. Results of the MDHS follow-up on prior year single audit findings;

4. Results of the review of documents submitted by the subgrantee;

5. Results of the desk review of supporting documentation for expenditures;

6. Results of previous on-site fiscal and programmatic reviews; and/or,

7. Specific requests by the MDHS Executive Director or Funding Division Director.

Monitoring Procedures

1. **Review of Reports Submitted by Subgrantees**

Subgrants may be monitored by reviewing reports submitted by the subgrantee for compliance with the subgrant agreement and program instructions. For example, the monthly reporting worksheets may be reviewed for accuracy and completeness or the quarterly programmatic report may be reviewed to ensure that each element of the Scope of Services is being met.

2. **Review of Supporting Documentation for Expenditures**

Subgrants may be monitored by performing a desk review of supporting documentation for expenditures reported under the subgrant. This review consists of contacting the subgrantee and requesting documents to support certain amounts included on the subgrantee‟s reporting worksheets. These documents will be examined by the monitors to determine compliance with the subgrant agreement and with State and Federal regulations. The results of the desk review will be communicated in a written report to the subgrantee and to the MDHS Funding Division.

Desk reviews may be conducted at any time by staff of the MDHS, Division of Program Integrity. The desk review procedure may be used in lieu of or in conjunction with an on-site fiscal review or as a follow-up to an on-site fiscal review to ensure that corrective actions have been implemented.

Fiscal monitoring through a desk review will include, at a minimum, a review of all documents to support all expenses reported for one month of the subgrant period. Documents shall be reviewed to support costs reported on the reporting worksheet submitted for the month in which the highest dollar amount of expenses was reported as of the date that the schedule letter was prepared to begin the desk review and request support documents.

When fiscal monitoring is initiated through a desk review and sufficient documents are not provided by the subgrantee/contractor to support costs reported on the reporting worksheet, the desk review shall cease and fiscal monitoring shall be completed through an on-site review.

Fiscal monitoring shall not be performed through a desk review on the first subgrant awarded to a subgrantee. In addition, monitoring through a desk review shall be alternated with on-site reviews so that on-site fiscal monitoring is performed at least every other year.

Monitoring for programmatic compliance cannot be performed through a desk review.

3. Review of the Subgrantee's Single Audit Report for Compliance, Evaluation of Audit Findings, and Follow-up on Corrective Actions

Subgrantees that expend $500,000.00 or more of Federal financial assistance during the subgrantee‟s fiscal year shall have an audit performed by an independent Certified Public Accountant in accordance with the Single Audit Act and OMB Circular A-133. As a part of MDHS‟ monitoring of each of its subgrants, these independent auditor‟s reports shall be obtained from the subgrantees and reviewed for compliance with Federal regulations.

Any audit findings identified in the independent auditor‟s reports, as well as the subgrantees proposed corrective action plans, shall be evaluated by the MDHS Funding Divisions. If the subgrantee‟s corrective action plan is acceptable, a management decision will be issued by the MDHS Funding Division to resolve the audit findings. The MDHS Division of Program Integrity will follow-up on the subgrantee‟s corrective action plan during the next on-site fiscal review that is conducted.

4. On-Site Reviews for Program Compliance

On-site reviews for program compliance are required to be conducted at least once during the subgrant period for every MDHS subgrant. On-site reviews for program compliance may be performed on any subgrant at any time and may be repeated as often as deemed necessary by MDHS. These reviews for program compliance will be conducted by the MDHS Division of Program Integrity.

The on-site programmatic reviews are formal in nature and are normally preceded by written notification to the subgrantee and to the appropriate MDHS Funding Division Directors. However, unannounced on-site programmatic reviews may also be conducted. On-site entrance and exit conferences will be conducted with subgrantee officials and a written report will be issued communicating the results of the review to the subgrantee and to the MDHS Funding Divisions. The Agency shall follow-up on the subgrantee‟s corrective action plan for any programmatic monitoring findings.

5. On-Site Reviews for Fiscal Compliance

On-site reviews for fiscal compliance will be conducted by the Division of Program Integrity, as provided under this section. These visits may also be conducted at the request of the MDHS Executive Director or the MDHS Funding Division Director.

These reviews are formal in nature and are normally preceded by written notification to the subgrantee. The appropriate Funding Division Directors shall also receive written notification of on-site fiscal reviews. However, unannounced on-site fiscal reviews may also be conducted. On-site entrance conferences will be conducted with subgrantee officials. Exit conferences will be

conducted and a written report will be issued communicating the results of the review to the subgrantee and to the MDHS Funding Divisions. MDHS shall follow-up on the subgrantee‟s corrective action plan for any fiscal monitoring findings.

6. Limited Scope Audits of Specific Compliance Areas

The Agency may engage an independent Certified Public Accountant to perform a Limited Scope Audit of certain MDHS subgrants. The need for this type of review shall be determined on an individual basis and shall be documented by the Division of Program Integrity. The results of this review shall be communicated to the subgrantee and to the MDHS Funding Divisions in a written report.

Corrective Action Process

The Initial Report of Findings and Recommendations that is forwarded to the subgrantee and to the MDHS funding division shall require a written response from the subgrantee within fifteen (15) working days. Upon receipt of the response from the subgrantee, the Director of the Office of Monitoring and other appropriate staff shall assess each response for adequacy. If all responses are adequate, a letter will be issued to the subgrantee clearing all findings. If any responses do not adequately address the findings, the subgrantee will be notified in writing by the issuance of a Status Report acceptable to MDHS requiring a second response from the subgrantee within ten (10) working days.

If the subgrantee fails to satisfactorily resolve all of the monitoring findings, the Office of Monitoring will issue a Final Notice Letter to the subgrantee demanding that the subgrantee refund the amount of questioned costs and advising the subgrantee of the procedures to follow if they wish to request an administrative hearing with the MDHS Executive Director.

If the subgrantee does not respond to the Final Notice Letter, the subgrantee will be referred to the State of Mississippi Office of the Attorney General to recover the unresolved questioned costs, and the Agency may begin procedures for debarment and suspension against the subgrantee organization and the subgrantee authorized official.

DCS (T&TA)

DCS staff uses several tools and checklists to conduct an overall comprehensive review of the agencies' operations. Throughout both the programmatic and fiscal review process there should be ongoing, open communication with the staff to facilitate clarification of facts and prevent misunderstandings, provide the reviewer with a full understanding of the agencies' operations, and provide the agency with a full understanding of the review process.

Preliminary areas of noncompliance should be summarized and discussed with the Executive Director and/or designated staff during the exit conference. Copies of specific documents, supporting schedules, and reports obtained during the site visit to facilitate preparation of the report

should be discussed during the exit conference. The agency is given the opportunity to provide comments and present additional information or explanation regarding a specific finding before it is included in the report.

The report should include specific timelines for any required corrective action associated with each finding. Copies of the report should be mailed to agency's Board and the agency's Executive Director. A copy should also be provided to the DCS Program Director and Compliance Officer.

The agency is required to respond in writing to each of the findings and observations mentioned in the report, including a detailed plan for taking corrective actions and implementing required changes. The initial response is due within 30 days from the date of the report. The agency's plan for resolution and corrective action will be reviewed by Compliance Team to ensure that all findings have been adequately addressed.

In the event an agency is unable or unwilling to correct a specified area of noncompliance within the prescribed timeline, DCS will report the deficiency to MDHS-Division of Program Integrity. If MDHS determines that the agency remains noncompliance in a specified area, DCS may contact DHHS to initiate proceedings to terminate the organization's designation as a Community Action Agency.

ATTACHMENT-AUDIT REQUIREMENTS

Per the MDHS Subgrant/Contract Manual

The Division of Program Integrity (DPI) is responsible for oversight of the subgrantee audit process and for monitoring program and fiscal activities involving subgrants. DPI collaborates with MDHS Funding Divisions to ensure resolution of audit findings by the MDHS Funding Divisions and to monitor the success of corrective actions taken.

The provisions of this section do not limit the authority of Federal agencies or their Inspectors General or other Federal officials, the Mississippi Department of Human Services, or the Office of the State Auditor, or their duly authorized representatives, to make or contract for audits, evaluations, or reviews. Subgrantees shall not constrain the above-named agencies, in any manner, from carrying out audits, evaluations, or reviews.

GENERAL

All MDHS subgrantees are required to complete the MDHS Subgrantee Audit Information Form (MDHS-DPI-002). This form must be submitted to the Division of Program Integrity - Office of Monitoring no later than ninety (90) calendar days after the end of the subgrantee's fiscal year. This form is necessary to certify the sources and amounts of all Federal awards received and expended by the subgrantee.

The MDHS Subgrantee Audit Policy has been prepared using as references the Single Audit Act Amendments of 1996 (Public Law 104-156) as implemented by the Office of Management and Budget (OMB) through OMB Circular A-133, "Audits of States, Local Governments and Non-Profit Organizations". Subgrantees that are commercial organizations (i.e., for-profit) shall not be subject to the audit requirements contained in OMB Circular A-133 unless specifically required by program regulations or by the terms and conditions of the subgrant agreement. Subgrantees which expend Federal financial assistance during the subrecipient's fiscal year of:

1. Less than $500,000.00 shall be exempt from Federal audit requirements, but must make records available for review by the appropriate officials. In addition, these subgrantees shall complete the MDHS Subgrantee Audit Information form and submit the form to the Division of Program Integrity - Office of Monitoring no later than ninety (90) calendar days after the end of the subgrantee's fiscal year;

2. $500,000.00 or more under only one Federal program may elect to have a program-specific audit, or a series of program audits, performed on each subgrant awarded by MDHS in accordance with Government Auditing Standards, or an organization-wide audit performed in accordance with OMB Circular A-133; or

3. $500,000.00 or more under more than one Federal program shall have an organization-wide audit performed in accordance with OMB Circular A-I33. A subgrantee that is a commercial organization which is specifically required by program regulations or by the terms and conditions of the subgrant agreement to have an audit, may elect to have a program-specific audit of all MDHS subgrants performed in accordance with Government Auditing Standards.

RESPONSIBILITIES OF SUBGRANTEES

The subgrantee shall:

1. Maintain and make records available for review or audit by appropriate officials of the Federal agency, pass-through entity, General Accounting Office (GAO), and/or the subgrantee's independent auditor;

2. Prepare financial statements that reflect its financial position, results of operations, and, where appropriate, cash flows for the fiscal year audited. The subgrantee shall also prepare a schedule of expenditures of Federal awards for the period covered by the subgrantee's financial statements, which shall be prepared in accordance with paragraph .310 of OMB Circular A-133;

3. Follow procurement standards prescribed by OMB Circular A-110 and the procurement section of this subgrantee manual in arranging for an independent audit to be performed by a Certified Public Accountant (CPA), in accordance with GAAS, GAGAS, and/or OMB Circular A-133, as applicable;

4. Ensure that audits are conducted and reported in accordance with Generally Accepted Auditing Standards (GAAS), Government Auditing Standards (GAS) and Circular A-133, as applicable, and that copies of the auditor's reports, and any management letters issued by the auditors, are submitted to the Division of Program Integrity - Office of Monitoring within nine (9) months after the end of the subgrantee's fiscal year;

   Be held responsible for follow-up and corrective action on all audit findings; (As part of this responsibility, the subgrantee shall prepare a summary of prior audit findings and a corrective action plan for current year audit findings. The summary schedule of prior audit findings and the corrective action plan shall include the reference numbers the auditor assigns to audit findings and the fiscal year in which the finding initially occurred. At the completion of the audit, the subgrantee shall prepare a corrective action plan to address each audit finding included in the current year auditor's reports. The corrective action plan shall provide the name(s) of the contact person(s) responsible forcorrective action, the corrective actions planned or implemented, and the anticipated completion date.)

6. Assure MDHS subgrants are properly identified and audited as part of an organization-wide audit. (MDHS may request a subgrantee which is required to have an organization-wide audit to have a particular program audited as a major program. Such requests shall be made at least 180 days prior to the end of the fiscal year to be audited. The subgrantee, after consultation with its auditor, shall inform MDHS whether the program would otherwise be audited as a major program using a risk based approach and, if not, the estimated incremental costs. MDHS shall then promptly confirm to the subgrantee whether it wants the program audited as a major program.)

7. Ensure that adequate funding is available to cover the cost of audits made in accordance with this section, either from non-Federal non-matching sources or as part of the subgrant agreement or other arrangement approved in advance by the MDHS Funding Division. For any audit costs charged directly or indirectly to any MDHS subgrant, or otherwise paid by

an MDHS Funding Division, the subgrantee shall submit a detailed invoice to the MDHS Funding Division that indicates the total audit cost, the audit cost allocated to each subgrant and the basis for allocating the audit cost to the subgrant; and

8. Prepare a separate schedule of indirect costs, if indirect costs are claimed under any MDHS subgrant, which shall at a minimum include a listing of actual indirect costs incurred during the subgrantee's fiscal year presented by line item; a description and amount of the base used to allocate indirect costs to all of the subgrantee's programs; and the calculation of an actual indirect cost rate based on the audited amounts; and,

9. Complete the MDHS Subgrantee Audit Information Form (M Di IS-DPI-002) and submit the form to the Division of Program Integrity - Office of Monitoring no later than ninety (90) calendar days from the end of the subgrantee's fiscal year; and,

10. Submit a copy of the data collection form and the reporting package, which are specified under Section 320 of OMB Circular A-133, directly to the Federal Audit Clearinghouse, Bureau of the Census, 1201 E. 10th Street, Jeffersonville, Indiana 47132.

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

March 7, 2016

Financial Audit Management Report

John Davis, Executive Director
Mississippi Department of Human Services
PO Box 352
Jackson, MS 39205

Dear Mr. Davis:

The Office of the State Auditor has completed its audit of selected accounts included on the financial statements of the Mississippi Department of Human Services for the fiscal year ended June 30, 2015. These financial statements will be consolidated into the State of Mississippi's *Comprehensive Annual Financial Report*. We conducted our audit in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States. The Office of the State Auditor's staff members participating in this engagement included Stephanie Palmertree, CPA, Jason Ashley, Haley Hesdorffer, David Hodges, Kari Horn and Cheryl Johnston, CPA.

Our procedures and tests cannot and do not provide absolute assurance that all state legal requirements have been met. In accordance with Section 7-7-211, Miss. Code Ann. (1972), the Office of the State Auditor, when deemed necessary, may conduct additional procedures and tests of transactions for this or other fiscal years to ensure compliance with legal requirements.

Internal Control over Financial Reporting

In planning and performing our audit of selected accounts included on the financial statements, we considered the Mississippi Department of Human Services' internal control over financial reporting (internal control) to determine the audit procedures that are appropriate in the circumstances for the purpose of expressing our opinion on these accounts, but not for the purpose of expressing an opinion on the effectiveness of internal control. Accordingly, we do not express an opinion on the effectiveness of the Mississippi Department of Human Services' internal control.

A *deficiency in internal control* exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct misstatements on a timely basis. A *material weakness* is a deficiency, or combination of deficiencies, in internal control, such that there is a reasonable possibility that a material misstatement of the entity's financial statements will not be prevented, or detected and corrected on a timely basis. A *significant deficiency* is a deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

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Our consideration of internal control was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies and therefore, material weaknesses or significant deficiencies may exist that were not identified. Given these limitations, during our audit we did not identify any deficiencies in internal control that we consider to be material weaknesses. However, material weaknesses may exist that have not been identified.

Compliance and Other Matters

As part of obtaining reasonable assurance about whether selected accounts included on the financial statements of the Mississippi Department of Human Services are free of material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts and grant agreements, noncompliance with which could have a direct and material effect on the determination of financial statement amounts. However, providing an opinion on compliance with those provisions was not an objective of our audit, and accordingly, we do not express such an opinion. The results of our tests disclosed no instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards*.

Purpose of this Report

The purpose of this report is solely to describe the scope of our testing of internal control and compliance and the result of that testing, and not to provide an opinion on the effectiveness of Mississippi Department of Human Services' internal control or on compliance. This report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the Mississippi Department of Human Services' internal control and compliance. Accordingly, this communication is not suitable for any other purpose. However, this report is a matter of public record and its distribution is not limited.

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,

Sallie Dier, CPA
Director, Financial and Compliance Audit Division

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

March 7, 2016

Single Audit Management Report

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

Dear Mr. Davis:

Enclosed for your review are the single audit findings and other audit findings for the Mississippi Department of Human Services for Fiscal Year 2015. In these findings, the Auditor's Office recommends the Mississippi Department of Human Services:

Single Audit Findings:

1. Strengthen controls over compliance with eligibility and benefit payment requirements of the Temporary Assistance for Needy Families (TANF) Program;
2. Strengthen controls over compliance with eligibility and benefit payment requirements of the Child Care and Development Fund (CCDF) cluster;
3. Strengthen controls over compliance with allowable cost requirements of the CCDF cluster;
4. Strengthen controls over submission of required federal reports of the Supplemental Nutrition Assistance Program (SNAP), CCDF and TANF programs;
5. Strengthen controls over on-site monitoring for SNAP, Social Services Block Grant (SSBG) and TANF Programs;
6. Strengthen controls over submission of required federal reporting elements and reports of the Low-Income Home Energy Assistance Program (LIHEAP);
7. Strengthen controls over the 20 percent exemption and five year time limit for the TANF Program;
8. Strengthen controls over termination of benefits for non-participation of work-eligible adults in the work activities program of the TANF Program;
9. Strengthen controls over subrecipient monitoring for OMB Circular A-133 audits for the SNAP, TANF, SSBG and LIHEAP Programs and for the CCDF Cluster;
10. Accurately report the status of prior year findings;
11. Ensure compliance with earmarking requirements of the CCDF Cluster; and
12. Ensure compliance with allowable cost requirements of the SNAP, TANF, CCDF, LIHEAP and SSBG Programs;

Other Audit Findings:

13. Strengthen controls over compliance with the Health and Safety requirements of the CCDF Program;
14. Strengthen controls over the data collection and submission of required federal reporting elements and reports for the TANF Program;

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15. Strengthen controls over segregation of duties and granting access to MAVERICS for the TANF Program; and
16. Strengthen controls over on-site monitoring for the CCDF and LIHEAP Programs.

Please review the recommendations and submit a plan to implement them by March 21, 2016. The enclosed findings contain more information about our recommendations.

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.

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,

Sallie Dier, CPA
Director, Financial and Compliance Audit Division

Enclosures

SINGLE AUDIT FINDINGS

In conjunction with our audit of federal assistance received by the State of Mississippi, the Office of the State Auditor has completed its audit of the State's major federal programs administered by the Mississippi Department of Human Services for the year ended June 30, 2015. The Office of the State Auditor's staff members participating in this engagement included Sallie Dier, CPA; Stephanie Palmertree, CPA; Jason Ashley; Cheryl Johnston, CPA; Haley Hesdorffer; David Hodges; Kari Horn; and John Newell.

Our procedures and tests cannot and do not provide absolute assurance that all federal legal requirements have been met. In accordance with Section 7-7-211, Miss. Code Ann. (1972), the Office of the State Auditor, when deemed necessary, may conduct additional procedures and tests of transactions for this or other fiscal years to ensure compliance with legal requirements.

Report on Compliance for Each Major Federal Program

We have audited the Mississippi Department of Human Services' compliance with the types of compliance requirements described in the *OMB Circular A-133 Compliance Supplement* that could have a direct and material effect on the federal programs selected for audit that are administered by the Mississippi Department of Human Services for the year ended June 30, 2015.

Management's Responsibility

Management is responsible for compliance with the requirements of laws, regulations, contracts, and grants applicable to its federal programs.

Auditor's Responsibility

Our responsibility is to express an opinion on compliance for each of the State of Mississippi's major federal programs based on our audit of the types of compliance requirements referred to above. We conducted our audit of compliance in accordance with auditing standards generally accepted in the United States of America; the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States; and OMB Circular A-133, *Audits of States, Local Governments, and Non-Profit Organizations*. Those standards and OMB Circular A-133 require that we plan and perform the audit to obtain reasonable assurance about whether noncompliance with the types of compliance requirements referred to above that could have a direct and material effect on a major federal program occurred. An audit includes examining, on a test basis, evidence about the Mississippi Department of Human Services' compliance with those requirements and performing such other procedures as we considered necessary in the circumstances. However, our audit does not provide a legal determination of the Mississippi Department of Human Services' compliance.

Results of Compliance Audit Procedures

The results of our auditing procedures disclosed instances of noncompliance with those requirements, which are required to be reported in accordance with OMB Circular A-133 and which are identified in this letter as items 2015-001, 2015-002, 2015-003, 2015-006, 2015-007, 2015-008, 2015-010, 2015-011 and 2015-012. In addition, we noted other instances of noncompliance that we have reported on the attached document, "Other Audit Findings," as item Oth-03 and Oth-04.

Internal Control over Compliance

Management of the Mississippi Department of Human Services is responsible for establishing and maintaining effective internal control over compliance with the types of compliance requirements referred to above. In planning and performing our audit of compliance, we considered the Mississippi Department of Human Services' internal control over compliance with the types of requirements that could have a direct and material effect on each major federal program to determine the auditing procedures that are appropriate in the circumstances for the purpose of expressing an opinion on compliance for each major federal program and to test and report on internal controls over compliance in accordance with OMB Circular A-133, but not for the purpose of expressing an opinion on the effectiveness of internal control over compliance. Accordingly, we do

not express an opinion on the effectiveness of Mississippi Department of Human Services' internal control over compliance.

Our consideration of internal control over compliance was for the limited purpose described in the preceding paragraph and was not designed to identify all deficiencies in internal control over compliance that might be material weaknesses or significant deficiencies and therefore, material weaknesses or significant deficiencies may exist that were not identified. However, as discussed below, we identified certain deficiencies in internal control over compliance that we consider to be material weaknesses and significant deficiencies.

A *deficiency in internal control over compliance* exists when the design or operation of a control over compliance does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, noncompliance with a type of compliance requirement of a federal program on a timely basis. A *material weakness in internal control over compliance* is a deficiency, or combination of deficiencies, in internal control over compliance, such that there is a reasonable possibility that material noncompliance with a type of compliance requirement of a federal program will not be prevented, or detected and corrected, on a timely basis. We consider the deficiencies in internal control over compliance identified in this letter as items 2015-001, 2015-002, 2015-003, 2015-004, 2015-005 and 2015-006 to be material weaknesses.

A *significant deficiency in internal control over compliance* is a deficiency, or a combination of deficiencies, in internal control over compliance with a type of compliance requirement of a federal program that is less severe than a material weakness in internal control over compliance, yet important enough to merit attention by those charged with governance. We consider the deficiencies in internal control over compliance identified in this letter as items 2015-007, 2015-008 and 2015-009 to be significant deficiencies.

In addition, we noted other deficiencies in internal control over compliance that require the attention of management that we have reported on the attached document, "Other Audit Findings," as items Oth-03, Oth-04, Oth-05, and Oth-06.

CFDA/Finding Number	Finding and Recommendation
	ELIGIBILITY
	Material Noncompliance ***Material Weakness***
93.558	Temporary Assistance for Needy Families
	Federal Award Number and Year:
	G1502MSTANF 2015 G1401MSCCDF 2014
	Questioned Costs: $5,215
2015-001	Controls Should Be Strengthened over the Compliance with Eligibility and Benefit Payment Requirements

Finding:

Per the *Code of Federal Regulations* (45 CFR Part 264.1), states have the option to extend assistance paid for by the Federal Temporary Assistance for Needy Families (TANF) program beyond the five year limit for up to 20 percent of the average monthly number of families receiving assistance during the fiscal year or the immediately preceding fiscal year, which-ever the state elects. States are permitted to extend assistance to families only on the basis of hardship or if the family includes someone who has been battered.

The Mississippi Department of Human Services has published *Volume III, TANF Policy Manual*, which establishes criteria for eligibility under the Temporary Assistance for Needy Families (TANF) program.

Chapter 3, Non-Financial Criteria, requires a MDHS-EA-312, Personal Responsibility Contract, be signed by each adult in the TANF assistance unit at the time of application; all TANF children under the age of 18 must have proof of current immunizations according to the schedule recommended by the Department of Health; and a parent or other relative who accepts a TANF benefit for a child due to the continued absence of a parent must assign support rights to the State by cooperating with the Division of Child Support Enforcement.

Chapter 4, Income and Eligibility Verification System (IEVS), requires all appropriate actions for IEVS data to be resolved in 45 days of the date the Agency receives the data.

Chapter 7, Eligibility Determination Process, requires the TANF case worker to review the Wired Third Party Query (WTPQ) inquiries for each household member age 16 and above at application and redetermination for TANF benefits.

Chapter 10, TANF Work Program Payment Process, states that for a person to receive TANF transitional services, the appropriate application for TANF

transitional services must be received within 30 days after the TANF case closes due to earned income; if applicable, requires completion of a TANF Child Care Application (MDHS-EA-379); and, if applicable, requires completion of a MDHS-EA-352 to verify number of classroom hours scheduled and attended. Additionally, if receiving a TANF Job Retention Bonus, applicants are required to complete a MDHS-EA-360. This chapter also requires participants of the TANF work component to meet specific participation hours to receive a TANF Work Transportation (J1) stipend and to verify employment and work hours every three months to receive Transitional TANF services. J1 stipends can be paid to TANF participants at the following levels: $180 for working 20 to 25 hours a week, $240 for working 26 to 31 hours a week, and $300 for working 32 to 40 hours a week.

During testing of TANF benefits paid during the fiscal year 2015, we noted the following exceptions:

- Two out of 62 Basic TANF cases tested are not exempt from incrementing the 60 month counter; however, the counter is not incrementing.
- Two out of 26 Transitional Work Transportation Assistance cases tested did not have a signed Transitional Service Application on file.
- Three out of 62 Basic TANF cases tested did not have a signed Personal Responsibility Contract on file.
- Four out of 26 Transitional Work Transportation Assistance cases tested did not have a signed Transitional Service Child Care Services Application on file.
- Four out of 62 Basic TANF cases tested had an open alert in IEVS longer than 45 days from the date the case was opened.
- Five out of 62 Basic TANF cases tested were missing acceptable forms of documentation for one or more children.
- Five out of 22 Work Transportation Stipend cases tested did not have supporting documentation for hours worked to support benefit paid.
- Six out of 62 Basic TANF cases tested did not have verification of immunization for a child not attending school.
- Seven out of 26 Transitional Work Transportation cases tested received benefits but did not have supporting documentation for hours worked to support benefits paid.
- Thirteen out of 62 Basic TANF cases tested were not complying with Child Support Enforcement on a child for which benefits were being received.

In performing testwork on TANF benefits paid to participants during fiscal year 2015, we noted the following questioned costs:

- Thirty two out of 62 Basic TANF benefits tested, or 52%, resulted in $2,695 of known questioned costs. Because of the lack of readily available access to all factors needed to determine the precise population, it is not practical to project known questioned costs.
- Five out of 22 J1 stipends paid to participants tested, or 23%, resulted in $720 of known questioned costs and $607,187 of projected questioned costs.

- Seventeen out of 26 Work Transportation stipends tested, or 65%, paid to participants resulted in $1,800 of known questioned costs and $1,288,746 of projected questioned costs.

The results of our testwork described above indicates total projected questioned costs of $1,895,933.

Failure to maintain supporting documentation for eligibility determination as well as not monitoring and reducing benefits to coincide with hours participated in TANF work component could result in questioned costs and recoupment of costs by the federal granting agency.

Recommendation:

We recommend the Mississippi Department of Human Services ensure compliance with TANF Eligibility determination and benefit requirements by strengthening control procedures to ensure all supporting documentation is reviewed and maintained and benefits are paid in accordance with the *Volume III, TANF Policy Manual.*

ELIGIBILITY

Material Noncompliance
Material Weakness

93.575 Child Care and Development Block Grant
93.596 Child Care Mandatory and Matching Funds of the Child Care and Development Fund

Federal Award Number and Year:

G1401MSCCDF 2014 G1501MSCCDF 2015

Questioned Costs: $7,201

2015-002 Controls Should Be Strengthened to Ensure Compliance with Eligibility and Benefit Payment Requirements of the CCDF Cluster

Finding:

The *Code of Federal Regulations* (45 CFR Part 98.20) sets forth the eligibility requirements for a child to receive child care services. The *Code of Federal Regulations* (45 CFR Part 98.50) further states how the Child Care and Development Block Grant (CCDF) funds should be expended for issuance of child care certificates. The Mississippi Department of Human Services' Division of Early Childhood Care and Development (DECCD) has published the *Mississippi Child Care Payment Program Policy Manual*, based on the CCDF State Plan, which incorporates applicable federal regulations and establishes eligibility criteria to receive child care certificate payments under the CCDF program. Specifically, Chapter 1 of this manual addresses family and child eligibility requirements, including the requirement that an eligible child be less

than 13 years of age, or 18 if the eligible child has special needs. This policy manual also provides for periodic re-determination of continuing eligibility.

In performing testwork on 60 child care certificate payments related to a child's eligibility for a child care certificate based on child care provider payments made during fiscal year 2015, we noted the following weaknesses:

- 29 instances, or 48 percent, in which the child's eligibility for the child care certificate could not be verified due to the child care certificate application and supporting documentation not being maintained by DECCD. This resulted in known questioned costs of $6,863. It was not feasible to project questioned costs associated with this exception due to insufficient information and the lack of child care applications and supporting documents.
- 16 instances, or 27 percent, in which the certificates were identified as being based on the initial determination of the child's eligibility for the child care certificate as a referral from the Division of Field Operations due to the parent/caretaker receiving basic TANF benefits or transitional TANF benefits, which is the first priority level for a child care certificate. However, based on auditor's review of the TANF case in MAVERICS and/or transitional TANF case in JAWS, the auditor determined that the parent/caretaker was no longer receiving any type of TANF benefits as of the child care certificate benefit date selected for testing, and; therefore should not have been continuing to receive the child care certificate benefit at the TANF priority level. It was not feasible to determine or project questioned costs associated with this exception due to the possibility that the parent/caretaker may still be eligible to receive child care assistance at a different priority level based on reapplying.
- 26 instances, or 43 percent, in which there were improper copay amounts based on the priority level and number of children in the family with an active child care certificate. This resulted in known questioned costs of $338 and projected questioned costs of $321,849.
- Seven instances, or 15 percent, in which provided social security numbers could not be verified due to supporting documentation not being maintained by DECCD.

Failure of DECCD to perform re-determination of a child's eligibility to ensure a child care certificate is properly issued could result improper payments to a child care provider representing questioned costs, and the possible recoupment of funds by the federal granting agency.

Recommendation:

We recommend the Mississippi Department of Human Services' Division of Early Childhood Care and Development ensure compliance with the eligibility costs requirements of the Child Care and Development Block Grant by strengthening control procedures to ensure child care certificate rates and copays are assigned in accordance with the requirements set forth in the *Code of Federal Regulations* and the *Mississippi Child Care Payment Program Policy Manual*.

ALLOWABLE COSTS/COST PRINCIPLES

Material Noncompliance
Material Weakness

93.575 Child Care and Development Block Grant
93.596 Child Care Mandatory and Matching Funds of the Child Care and Development Fund

Federal Award Number and Year:

G1401MSCCDF 2014 G1501MSCCDF 2015

Questioned Costs: $5,214

2015-003 Controls Should Be Strengthened to Ensure Compliance with Allowable Cost Requirements of the CCDF Cluster

Finding:

The *Code of Federal Regulations* (45 CFR 98) regulates expenditures of funds under the Child Care and Development Block Grant (CCDF), including the identification of allowable costs for CCDF expended through the child care certificate program. The Mississippi Department of Human Services' Division of Early Childhood Care and Development (DECCD) has published the *Mississippi Child Care Payment Program Policy Manual*, based on the CCDF State Plan, which incorporates applicable federal regulations and establishes allowable costs for child care certificate payments under the CCDF program. Specifically, Section 103.02 of this manual addresses co-payment fees and Section 104.04 addresses child care certificate rates. Therefore, eligible school-aged children should be issued certificates that state both full-time and part-time rates eligibility so that the provider can record the proper attendance each day (full-time when school is not in session or part-time when school is in session).

In performing allowable costs testwork related to certificate rates and co-pays during fiscal year 2015, we noted the following:

- Six instances out of 60, or 10 percent, in which a school-aged child was issued a child care certificate that provided for only full-time attendance rates and co-pays to be paid to a child care provider, resulting in payment of full-time rates and co-pays for part-time attendance. These six instances resulted in known questioned costs of $3,440 out of total year-end school-aged certificate payments of $18,013,581 and projected questioned costs of $2,151,374.
- Three instances out of 60, or 5 percent, in which school-aged children were issued a child care certificate that provided both full-time and part-time attendance rates, but the provider recorded, and was paid, only full-time rates during months school was in session. These three instances resulted in known questioned costs of $1,497 out of total year-end school-aged certificate payments of $18,013,581 and projected questioned costs of $936,136.

- Two instances out of 60 in which issued child care certificates authorized only 21/23 days attendance, but the provider recorded, and was paid for, 31 days attendance. These two instances resulted in known questioned costs of $277 out of total year-end certificate payments of $63,547,740 and projected questioned costs of $261,644.
- One instance out of 60 in which the approved Child Care Payment Program provider information could not be verified due to the provider application and supporting documentation not being maintained by DECCD.
- One instance out of 60 in which the provider payment for the tested benefit month could not be verified in the Agency's accounting records.

Failure of DECCD to properly provide for the payment of part-time rates on the certificates for school-aged children and to properly maintain supporting documentation for benefits issued can result in improper payments to child care providers, questioned costs and the possible recoupment of funds by the federal granting agency.

Recommendation:

We recommend the Mississippi Department of Human Services' Division of Early Childhood Care and Development ensure compliance with the allowable costs requirements of the Child Care and Development Block Grant by strengthening control procedures to ensure child care certificate rates and co-pays are assigned and providers paid in accordance with the requirements set forth in the *Code of Federal Regulations* and the *Mississippi Child Care Payment Program Policy Manual*.

REPORTING

Material Weakness

10.551	Supplemental Nutrition Assistance Program
10.561	State Administrative Matching Grants for the Supplemental Nutrition Assistance Program
93.558	Temporary Assistance for Needy Families State Programs
93.575	Child Care and Development Block Grant
93.596	Child Care Mandatory and Matching Funds of the Child Care and Development Fund

Federal Award Number and Year:

12-35-2841– B13	2013	G1402MSTANF	2014
12-35-2841 – B14	2014	G1502MSTANF	2015
12-35-2841– B15	2015	G1201MSCCDF	2012
2013IS750345	2013	G1301MSCCDF	2013
2014IS750345	2014	G1401MSCCDF	2014
2015IS750345	2015	G1501MSCCDF	2015

Questioned Costs: None

2015-004 Controls Should Be Strengthened over the Submission of Required Federal Reports

Finding:

The *Code of Federal Regulations* (45 CFR Part 265.3) requires a "TANF Data Report" (ACF-199) for the Temporary Assistance to Needy Families (TANF) program to be completed and submitted in accordance with instructions provided by the Administration for Children and Families. Those instructions require States to submit quarterly reports for each open fiscal year of grant funds until all funds are expended; therefore, States will likely submit separate forms for multiple grant award years simultaneously. These reports are due and must be submitted 45 days after the end of each quarter – February 14th, May 15th, August 14th and November 14th.

During testwork performed for the reporting requirements of the TANF program during fiscal year 2015, we noted the following exceptions:

- Sections two, three and four of the December 31, 2014 quarterly reports were not submitted within 45 days after the end of the reporting period. Reports averaged 7 days late.
- Sections one, two, and four of the June 30, 2015 quarterly reports were not submitted within 45 days after the end of the reporting period. Reports averaged 49 days late.

The *Code of Federal Regulations* (45 CFR Part 265.6) requires a "Quarterly Financial Status Report" (ACF-196) for the TANF program to be completed and submitted in accordance with instructions provided by the Administration for Children and Families. Those instructions require States to submit quarterly reports for each open fiscal year of grant funds until all funds are expended; therefore, States will likely submit separate forms for multiple grant award years simultaneously. These reports are due and must be submitted 45 days after the end of each quarter – February 14th, May 15th, August 14th and November 14th.

During testwork performed for the program specific reporting requirements of the TANF program during fiscal year 2015, we noted five out of seven reports submitted were not submitted within 45 days after the end of the reporting period. Reports averaged 14 days late.

The *Code of Federal Regulations* (45 CFR Part 98.70) requires a "Quarterly Financial Status Report" (ACF-696) for the Child Care and Development Fund (CCDF) program to be completed and submitted in accordance with instructions provided by the Administration for Children and Families. Those instructions require States to submit quarterly reports for each open fiscal year of grant funds until all funds are expended; therefore, States will likely submit separate forms for multiple grant award years simultaneously. These reports are due and must be submitted 30 days after the end of each quarter – January 31st, April 30th, July 31st and October 31st.

During testwork performed for the program specific reporting requirements of the CCDF program during fiscal year 2015, we noted 12 out of 12 reports submitted were not submitted within 30 days after the end of the reporting period. Reports averaged 14 days late.

The *Code of Federal Regulations* (45 CFR Part 75.341) grants the Health and Human Services awarding agency authority to require financial reporting for effective monitoring of federal awards. The Federal Financial Report (FFR) is required to be completed and submitted in accordance with instructions provided by the Administration for Children and Families, and must be submitted quarterly, semiannually or annually, based on instructions from the ACF and awarding agency. Those instructions require States to submit quarterly and semi-annual reports no later than 30 days after the end of each reporting period and annual reports no later than 90 days after the end of each reporting period or grant period end date.

During testwork performed for reporting requirements of the TANF, CCDF, and Supplemental Nutrition Assistance Program (SNAP) programs during fiscal year 2015, we noted the following exceptions:

- Two of the two reports tested for the quarterly TANF FFR-425 reports were not submitted within 30 days after the end of the reporting period. Reports averaged 21 days late.
- Two of the two reports tested for the quarterly CCDF FFR-425 reports were not submitted within 30 days after the end of the reporting period. Reports averaged 21 days late.
- Four of the six reports tested for the quarterly SNAP FFR-425 reports were not submitted within 30 days after the end of the reporting period. Reports averaged 14 days late.

Good internal controls over reporting should include a timely and independent review of information reported. Failure to timely review and submit reports could result in reporting penalties and could impact ACF's funding determinations.

Recommendation:

We recommend MDHS strengthen the controls over the preparation, review and timely submission of required performance and financial reports prior to submission to the Department of Health and Human Services.

SUBRECIPIENT MONITORING

Material Weakness

10.551	Supplemental Nutrition Assistance Program
10.561	State Administration Matching Grants for the Supplemental Nutrition Assistance Program
93.558	Temporary Assistance for Needy Families
93.667	Social Services Block Grant

Federal Award Number and Year:

12-35-2841 – B14	2014	G1402MSTANF	2014
12-35-2841– B15	2015	2014IS750345	2014
G1201MSSOSR	2012	G1401MSSOSR	2014

Questioned Costs: None

2015-005 Controls Should Be Strengthened over On-Site Monitoring

Finding:

The terms and conditions of the grant agreements between the Mississippi Department of Human Services (MDHS) and the U.S. Department of Health and Human Services require MDHS to administer grants in compliance with the Code of Federal Regulations (45 CFR Part 92). The Code of Federal Regulations (45 CFR Part 92.40) designates MDHS for managing the day-to-day operations of grant and subgrant supported activities. Grantees must monitor grant and subgrant supported activities to assure compliance with applicable Federal requirements and to ensure performance goals are being achieved. Grantee monitoring must cover each program, function or activity.

We evaluated MDHS's compliance with subrecipient monitoring requirements based on written policies and procedures designed by MDHS's Division of Program Integrity – Office of Monitoring (OM) to satisfy during-the-award monitoring requirements. OM procedures require an on-site monitoring review of each subgrantee contract at least once during the subgrant period. A tracking mechanism is used to ensure all subgrantee contracts are properly identified and monitored. Monitoring tools/checklists are used during each on-site monitoring review to provide guidance and to document a review was performed. The on-site monitoring workpapers are reviewed and approved by OM supervisory personnel prior to issuance of a written report, the Initial Report of Findings & Recommendations, which is used for communicating finding(s) and/or questioned costs to subgrantees. The written report should be issued within 30 working days from the date of the exit conference, which is normally held on the last day of the on-site review.

During testwork performed on subrecipient on-site monitoring for 32 subgrant contracts during state fiscal year 2015, we noted the following weaknesses:

- Eight contracts tested, or 25 percent, were not monitored within the contract period as required by Program Integrity's Division of Monitoring procedures. Contracts were monitored between 58 and 180 working days later, with an average of 108 working days after the contract end date.
- Eight contracts, or 25 percent, were noted where Corrective Actions were not received from the subrecipient within 15 working days from the date the Initial Monitoring Report (IMR) was issued:

    - Corrective Actions were received between 17 and 26 days from the IMR, with an average of 18 days passing between the IMR and subgrantee's response.
    - Two contracts never received a Corrective Actions response; however, demand letters were sent and an Administrative Hearing was requested.
- Nine contracts, or 28 percent were noted in which the Initial Monitoring Report was not issued within 60 days of the exit conference:
    - IMR's were issued between 66 and 155 days late, with an average of 105 working days after the exit conference took place.
- Three contracts, or nine percent, in which the Fact Finding Sheet showed no evidence of the Subgrantee's signature.
- Four contracts, or 13 percent, in which Question Costs had not been completely resolved as of the date of testwork.
- During our verification of the completeness of the sample population of 115, we noted three contracts that were listed on the GM18 report and had expenditures in FY2014 were not included on the SFY2014 Subgrant Monitoring Tracking document. Of the three contracts, two contracts were not subjected to on-site monitoring within the contract period. These two contracts total $1,146,490 out of $62,957,259 (1.8%) in the population

MDHS programmatic funding divisions rely upon OM monitoring procedures to verify compliance with program regulations and to identify potential problem areas needing corrective action. Failure to properly monitor subrecipients in a timely manner could allow noncompliance with federal regulations to occur and go undetected, potentially resulting in questioned costs.

Recommendation:

We recommend the Mississippi Department of Human Services' Division of Program Integrity – Office of Monitoring (OM) strengthen its existing internal controls over on-site monitoring to ensure all active subgrantee contracts are timely monitored during-the-award in accordance with OM policies and procedures. We also recommend that the agency ensure that the Report of Findings & Recommendations prepared as a result of the on-site monitoring be issued in a timely manner to enable immediate corrective action procedures to be initiated. We further recommend that the agency maintain all supporting monitoring tools, reports, and correspondence in the monitoring file.

REPORTING

Immaterial Noncompliance
Material Weakness

93.568 Low Income Home Energy Assistance Program

Federal Award Number and Year:

G13B1MSLIEA – 2013
G14B1MSLIEA – 2014
G15B1MSLIEA – 2015

Questioned Costs: None

2015-006 Controls Should Be Strengthened over the Submission of Required Federal Reporting Elements and Reports.

Finding:

The *Code of Federal Regulations* (45 CFR Part 75.341) grants the Health and Human Services awarding agency authority to require financial reporting for effective monitoring of federal awards. The Federal Financial Report (FFR) is required to be completed and submitted in accordance with instructions provided by the Administration for Children and Families, and must be submitted quarterly, semiannually or annually, based on instructions from the ACF and awarding agency. Those instructions require States to submit quarterly and semi-annual reports no later than 30 days after the end of each reporting period and annual reports no later than 90 days after the end of each reporting period or grant period end date.

Additionally, the *Office of Management and Budget Circular A-133* compliance supplement requires submitted reports agree to the reporting entity's accounting records that support the audited financial statements and the Schedule of Expenditures of Federal Awards.

During testwork performed for reporting requirements for LIHEAP for fiscal year 2015, we noted the following exceptions:

- One instance in which the amount reported on the FFR-425 for Line F "Federal Share of Unliquidated Obligations" does not agree to the amount on the supporting accounting records. The amount reported on the FFR-425 listed the balance of Unliquidated Obligations as $17,099,467; however, the supporting accounting records listed the amount as $12,701,200.
- One instance in which the amount reported on the FFR-425 for Line H "Unobligated Balance of Federal Funds" does not agree to the amount on the supporting account records. The amount reported on the FFR-425 listed the balance of Unobligated Obligations as $0; however, the supporting accounting records listed the amount as $4,398,267.
- The FFR-425 report required to be submitted for the Final reporting period of the 13B1MSLIEA federal grant was not submitted.
- $117,345 of expenditures allocated to the LIHEAP program during the Cost Allocation Process were not reported as expenditures on the FFR-425.

Good internal controls over reporting should include an independent review of information reported. Failure to review for anomalies in the data and timely filing of reports could impact ACF's funding determinations.

Recommendation:

We recommend MDHS strengthen the controls over the preparation, review and timely submission of required performance and financial reports prior to submission to the Department of Health and Human Services.

EARMARKING

Immaterial Noncompliance
Significant Deficiency

93.558 Temporary Assistance for Needy Families State Programs

Federal Award Number and Year:

G1502MSTANF 2015

Questioned Costs: $6,210

2015-007 Controls Should Be Strengthened over 20 Percent Exemption and Five Year Time Limit

Finding:

Per the *Code of Federal Regulations* (45 CFR Part 264.1), states have the option to extend assistance paid for by the Federal Temporary Assistance for Needy Families (TANF) program beyond the five year limit for up to 20 percent of the average monthly number of families receiving assistance during the fiscal year or the immediately preceding fiscal year, which-ever the state elects. States are permitted to extend assistance to families only on the basis of hardship or if the family includes someone who has been battered.

The Mississippi Department of Human Services (MDHS) has published a *Volume III, TANF Policy Manual*, which establishes internal control procedures to be used in the administration of TANF benefits. Specifically, Chapter 3 of the *Volume III, TANF Policy Manual* includes procedures for ensuring compliance with applicable time limits and extension criteria. The "Statewide TANF 20 Percent Exemption Summary Report" (TA120B) identifies the number of cases over 60 months receiving benefits. The TA120B is distributed to county and regional offices monthly and should be used to monitor compliance with the 20 percent maximum earmark. Additionally, a "TANF High Counter Report" is generated monthly and details each case over 60 months receiving benefits. The "TANF High Counter Report" should be reviewed by county/regional personnel to ensure time limits are not exceeded for cases approaching the 60 month time limit unless a proper exemption is granted.

During testwork related to the 20 percent maximum earmark, we reviewed both monthly reports and noted the following:

- No documented review exists of the "Statewide TANF 20 Percent Exemption Summary Report" (TA120C/TA120B Report).
- No documented review exists of the "TANF High Counter Report" (JC250A Report).
- Of 10 cases examined, four cases received a benefit after the 60 month counter was exhausted and did not meet the criteria for an exemption per policy Volume III Chapter 3.

Failure to monitor the "Statewide TANF 20 Percent Exemption Summary Report" could result in the State exceeding the percent of allowed exemptions for TANF assistance. However, our testwork did not reveal evidence of the 20 percent maximum earmark being exceeded at any point during fiscal year 2015.

Failure to sufficiently monitor the "TANF High Counter Report" and perform appropriate actions for recipients approaching or exhausting the five-year time limit resulted in benefit payments of $6,210 to ineligible participants during fiscal year 2015.

Recommendation:

We recommend the Mississippi Department of Human Services strengthen control procedures to include a documented review of the monthly "Statewide TANF 20 Percent Exemption Summary Report" and "TANF High Counter Report." Further, we recommend the central office implement procedures to confirm county/regional personnel have performed the required reviews of their respective reports and take appropriate action to either terminate benefits or grant permissible exemptions for cases exhausting the five year limit for benefits.

SPECIAL TESTS

Immaterial Noncompliance
Significant Deficiency

93.558 Temporary Assistance for Needy Families State Programs

Federal Award Number and Year:

G1502MSTANF 2015

Questioned Costs: $3,705

2015-008 Controls Should Be Strengthened over Termination of Benefits for Non-Participation of Work-Eligible Adults in the Work Activities Program

Finding:

The *Code of Federal Regulations* (45 CFR Part 261.10) states a parent or caretaker receiving assistance as part of the Temporary Assistance for Needy Families (TANF) program must engage in work activities when the State has determined an individual is ready to engage in work or when he or she has received assistance for a total of 24 months, whichever is earlier.

Volume III, TANF Policy Manual, published by the Mississippi Department of Human Services (MDHS), establishes requirements for satisfactory participation in the TANF work program. Specifically, Chapter 9 of the *Volume III, TANF Policy Manual* requires all adult TANF recipients who are determined work-eligible to participate in the TANF work program in order to continue receiving benefits. State law limits the receipt of TANF benefits to a maximum of 24 months for work-eligible adults who fail to participate without good cause in allowable TANF work program activities.

Discussions with agency personnel in the Division of Field Operations indicate there is currently no policy requiring review of the "TANF High Counter Report", which tracks the months a TANF recipient has not participated in a TANF work activity. Review of the report at the county/regional offices and in the central office would have allowed prevention/detection of the errors by MDHS personnel.

Due to the lack of controls being in place, auditors substantively tested a sample of the transactions to verify that benefits were not paid in error and noted six of out 15 cases tested that continued to receive benefits after exceeding the 24 month counter.

In performing testwork on TANF benefits paid to participants during fiscal year 2015, we noted six out of 15 benefits tested, or 40 percent, continued to receive benefits after exceeding the 24 month counter, which resulted in $3,705 of known questioned costs. Because of the lack of readily available access to all factors needed to determine the precise population, it is not practical to project known questioned costs.

Failure to properly reduce or terminate benefits could result in questioned costs and recoupment of costs by the federal granting agency. Additionally, per the *Code of Federal Regulations* (45 CFR Part 261.14 and 261.54), if MDHS does not properly reduce or terminate benefits, the Department of Health and Human Services may penalize MDHS by reducing grant assistance between one and five percent.

Recommendation:

We recommend the Mississippi Department of Human Services strengthen control procedures over work-eligible recipients who are not participating in work activities. Control procedures should include a documented review of the monthly "TANF High Counter Report". Further, we recommend the central office implement procedures to confirm county/regional personnel have reviewed their respective reports and taken appropriate action to either terminate/reduce benefits or grant permissible exemptions for cases exhausting the 24 month maximum for non-participation in a work program.

SUBRECIPIENT MONITORING

Significant Deficiency

10.561	State Administrative Matching Grants for the Supplemental Nutrition Assistance Program
93.558	Temporary Assistance for Needy Families State Programs
93.568	Low-Income Home Energy Assistance Program
93.575	Child Care and Development Block Grant
93.596	Child Care Mandatory and Matching Funds of the Child Care Development Fund
93.667	Social Services Block Grant

Federal Award Number and Year:

SNAP Letter of Credit		G1201MSSOSR	2011
G1102MSTANF	2011	G1301MSSOSR	2012
G1202MSTANF	2012	G1301MSSOSR	2013
G1302MSTANF	2013	G11B1MSLIEA	2011
G1001MSCCDF	2010	G12B1MSLIEA	2012
G1101MSCCDF	2011	G13B1MSLIEA	2013
G1201MSCCDF	2012		
G1301MSCCDF	2013		

Questioned Costs: None

2015-009 Controls Should Be Strengthened over Subrecipient Monitoring for OMB Circular A-133 Audits for the SNAP, TANF, SSBG and LIHEAP Programs and for the CCDF Cluster

Finding:

The Office of Management and Budget (OMB) Circular A-133 states the pass-through entity is responsible for (1) ensuring that subrecipients expending $500,000 or more in Federal awards during their fiscal year have met the audit requirements of OMB Circular A-133 and that the required audits are completed within nine months of the end of the subrecipient's audit period; (2) issuing a management decision on findings within 6 months after receipt of the subrecipient's audit report; and (3) ensuring that the subrecipient takes timely and appropriate corrective action on all audit findings. In cases of continued inability or unwillingness of a subrecipient to have the required audits, the pass-through entity shall take appropriate action using sanctions.

During our audit of the Mississippi Department of Human Services (MDHS), we reviewed the Division of Program Integrity – Office of Monitoring (OM) audit files and Monitoring Tracking Document for MDHS Subgrantees for state fiscal year 2013. During our review, we noted the following problems.

- Of 23 subgrantees tested, we noted seven instances in which the OMB A-133 audit reports/SAIF forms for the subgrantee were not received by Office of Monitoring within nine months of the subgrantee's fiscal year end. In each instance where an audit was received, we noted that the OMB A-133 audit report was dated within the nine month period of the subgrantee's fiscal year end. Office of Monitoring sent an initial letter and a reminder letter to each subgrantee regarding their OMB A-133 audit report requirements. Subgrantee audit reports were received on average 98 days after the nine month deadline.
- Of seven subgrantees tested on Attachment B of the Status Report, we noted seven instances in which the OMB A-133 audits or Subgrantee Audit Information Forms (SAIF) for the subgrantees were not received by Office of Monitoring within nine months of the subgrantee's fiscal year end. In four of the seven instances in which an audit was received, we noted that the OMB A-133 audit report was dated within the nine month period of the subgrantee's fiscal year end. Office of Monitoring sent an initial letter, a

reminder letter, and a demand letter to each subgrantee regarding their OMB A-133 audit report requirements, but no additional follow-up to obtain the OMB A-133 audit/SAIF was made by Office of Monitoring prior to the auditor's request. Subgrantee audit reports were received on average 405 days after the nine month deadline.

- During testing of completeness, we noted seventeen instances in which subrecipients were not included on the FY2013 tracking report utilized by Office of Monitoring but had expenditures in FY2013 and should have been included for tracking purposes.

Failure to properly monitor subrecipients could allow noncompliance with federal regulations to occur and go undetected, potentially resulting in questioned costs.

Recommendation:

We recommend the Mississippi Department of Human Services' Division of Program Integrity – Office of Monitoring (OM) strengthen controls over subrecipient monitoring for OMB A-133 audits to ensure recipients expending $500,000 or more in Federal funds during their fiscal year are appropriately monitored and an OMB A-133 audit is obtained. We also recommend that the agency follow-up more frequently with the funding divisions to ensure corrective action was taken when a subgrantee's audit report contains findings. We further recommend that OM should ensure all subrecipients are included on the tracking report and continue to follow-up to obtain an OMB A-133 audit or Subgrantee Audit Information Form after the demand letter is issued.

REPORTING

Immaterial Noncompliance

93.558 Temporary Assistance for Needy Families State Programs
93.568 Low-Income Home Energy Assistance Program

Federal Award Number and Year:

1402MSTANF (2014)	G14B1MSLIEA (2014)
1502MSTANF (2015)	G15B1MSLIEA (2015)

Questioned Costs: None

2015-010 Agency Should Accurately Report the Status of Prior Year Findings

Finding:

The *Code of Federal Regulations* (2 CFR Part 200.511) tasks auditees with the responsibility for follow-up and corrective action on all audit findings. As a part of this responsibility, auditees are required to report the status of all audit findings included in the prior audit's schedule of findings and questioned costs. Auditees may either note that the finding has been 1)fully corrected, 2)partially corrected, or 3)not corrected. Additionally, the *Code of Federal Regulations* (2 CFR Part 200.516) requires that the auditee prepared "Summary Schedule of

Prior Year Findings" must not materially misrepresent the status of any prior year audit finding.

During testwork performed for the Mississippi Department of Human Services for fiscal year 2015, we noted that the Summary Schedule of Prior Year Findings provided by the agency reported that the status of prior year reporting findings related to the Federal Funding Accountability and Transparency Act (FFATA) was "FULLY CORRECTED" for the Temporary Assistance for Needy Families (TANF) State Programs and the Low-Income Home Energy Assistance Programs (LIHEAP). However, upon verification of this status, we noted the following.

- Of the six LIHEAP awards tested that met the FFATA reporting requirements, 100 percent of the subawards were not reported in the FSRS system by the last day of the month following the obligation date.
- Of the six LIHEAP awards tested that met the FFATA reporting requirements, 100 percent of the subaward amounts were incorrectly reported in the FSRS system.
- Of the 12 TANF awards tested that met the FFATA reporting requirements, eight of the subawards subaward amounts were incorrectly reported in the FSRS system.
- Of the 12 TANF awards tested that met the FFATA reporting requirements, four of the subawards were not reported in the FSRS system by the last day of the month following the obligation date.

The Division of Field Operations has not established internal control policies or procedures nor is a supervisory review performed of the subrecipient contract information that is reported to verify the data is reported accurately or timely.

Noncompliance with federal requirements could result in reduced funding for applicable programs.

Recommendation:

We recommend that the Mississippi Department of Human Services ensure compliance with reporting requirements by accurately reflecting the status and corrective action of prior year findings.

EARMARKING

Immaterial Noncompliance

93.575 Child Care and Development Block Grant
93.596 Child Care Mandatory and Matching Funds of the Child Care and Development Fund

Federal Award Number and Year:

G1202MSCCDF 2012

Questioned Costs: $99,295

2015-011 Agency Should Ensure Compliance with Earmarking and Minimum Targeted Funds Provisions and Requirements

Finding:

The terms and conditions of the 2012 federal grant agreement between the Mississippi Department of Human Services (MDHS) and the Department of Health and Human Services - Administration for Children and Families Division (ACF) include provisions of the 2012 Omnibus Appropriations Bill (Public Law. 111-8) which targeted specific amounts for the following activities related to the Child Care and Development Block Grant (CCDF):

- Child Care Quality Improvements
- Infant and Toddler Quality Improvement
- Child Care Resource and Referral and School Aged Child Care Activities

ACF posts on its website the CCDF allocation tables with the minimum amount of funds each state must expend in targeted areas. The minimum expenditures are determined by ACF based on various statistics and population data received by ACF from each state.

During our testing of MDHS's final ACF-696 financial report for federal grant year 2012, we noted the minimum expenditure requirements for Mississippi, as established by ACF, were not met as follows for CCDF Discretionary awards.

- Expenditures were $3,582 below the minimum requirement of $1,603,828 for the Infant and Toddler Quality Improvements earmark on 2012 CCDF Discretionary funds.
- Expenditures were $95,713 below the minimum requirement of $2,769,344 for the Child Care Quality Improvements earmark on 2012 CCDF Discretionary funds.

Failure to monitor earmarks for minimum compliance throughout the financial reporting period could result in questioned costs and recoupment of costs by the federal granting agency.

Recommendation:

We recommend the Mississippi Department of Human Services ensure minimum targeted funds are obligated and expended to meet the Child Care and Development Block Grant (CCDF) earmarking requirements.

ALLOWABLE COSTS/COST PRINCIPLES

Immaterial Noncompliance

10.551 Supplemental Nutrition Assistance Program
10.561 State Administrative Matching Grants for the Supplemental Nutrition Assistance Program

93.558	Temporary Assistance for Needy Families State Programs
93.568	Low-Income Home Energy Assistance Program
93.575	Child Care and Development Block Grant
93.596	Child Care Mandatory and Matching Funds of the Child Care Development Fund
93.667	Social Services Block Grant

Federal Award Number and Year:

SNAP Letter of Credit		G1301MSSOSR	2013
G1402MSTANF	2014	G1401MSSOSR	2014
G1502MSTANF	2015	G1501MSSOSR	2015
G1201MSCCDF	2012	G12B1MSLIEA	2012
G1301MSCCDF	2013	G13B1MSLIEA	2013
G1401MSCCDF	2014	G14B1MSLIEA	2014
G1501MSCCDF	2015	G14B1MSLIEA	2015

Questioned Costs: $347,248

2015-012 Agency Should Ensure Compliance with Allowable Costs Requirements.

Finding:

The Code of Federal Regulations (45 CFR Part 95 and 2 CFR Part 200) requires that programs administered by the respective federal authority adhere to the cost principles of OMB Circular A-87. OMB Circular A-87, Attachment C requires the distribution of joint costs related to a grant program to be supported by a cost allocation plan (CAP). Further, 45 CFR Part 95.517 states that a State may claim costs based on a proposed plan, unless otherwise advised by the Division of Cost Allocation in the appropriate HHS Regional Office.

During testwork performed for the Division of Cost Allocation for allocated costs during fiscal year 2015, we noted that certain shared costs that should have been charged directly to cost centers/cost pools for further allocation were instead charged in error to "roll up" cost centers and did not flow through the cost allocation process.

The above instances of noncompliance resulted in known questioned costs of $347,248.

Noncompliance with federal allowable costs requirements could potentially result in costs not being accumulated and allocated correctly and could result in questioned costs and recoupment of costs by the federal granting agency.

Recommendation:

We recommend the Mississippi Department of Human Services strengthens its policies to ensure that joint indirect costs are charged to the proper cost centers so that they flow through the cost allocation process for proper assignment to the agency's federal programs.

OTHER AUDIT FINDINGS

In planning and performing our audit of the federal awards received by the Mississippi Department of Human Services for the year ended June 30, 2015, we considered internal control over compliance with the requirements that could have a direct and material effect on the major federal programs. Matters which require the attention of management were noted. These matters which do not have a material effect on the agency's ability to administer major federal programs in accordance with applicable laws, regulations, or provisions of contracts or grant agreements involve an immaterial instance of noncompliance and other control deficiencies.

A *deficiency in internal control over compliance* exists when the design or operation of a control over compliance does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, noncompliance with a type of compliance requirement of a federal program on a timely basis.

CFDA/Finding Number	Finding and Recommendation
	SPECIAL TESTS
	Immaterial Noncompliance ***Control Deficiency***
93.575 93.596	Child Care and Development Block Grant Child Care Mandatory and Matching Funds of the Child Care and Development Fund
	Federal Award Number and Year:
	G1502MSCCDF20145
	Questioned Costs: None
Oth-03	Controls Should Be Strengthened over Compliance with the Health and Safety Requirements.

Finding:

The *Code of Federal Regulations* (45 CFR 98.11) requires the Mississippi Department of Human Services (MDHS) as the lead agency to monitor Child Care and Matching Funds of the Child Care and Development Funds (CCDF) programs and services.

Per Section 98.41 of the Code of Federal Regulations, MDHS must certify that monitoring and enforcement procedures are in place to verify that child care providers (unless they meet an exception) serving children who receive subsidies satisfy the requirements pertaining to preventions and control of infectious diseases, building and physical premises safety, and basic health and safety training for providers.

MDHS has published the State Plan for the Child Care and Development Fund for fiscal year 2014/2015, which establishes procedures and policy under the CCDF program. According to the State Plan, the Division of Early Child Care

Development (DECCD) will rely on the Mississippi Department of Health (MDH) to ensure compliance with the health and safety requirements.

In performing testwork of compliance with health and safety requirements, we noted no documentation of communication with MDH to confirm providers are complying with the applicable health and safety requirements.

Failure of DECCD to properly confirm providers are complying with applicable health and safety requirements could result in unlicensed providers receiving program benefits.

Recommendation:

We recommend that DECCD strengthen controls related to the monitoring and enforcement of health and safety requirements for childcare providers participating in the child care certificate program.

REPORTING

Immaterial Noncompliance
Control Deficiency

93.558 Temporary Assistance for Needy Families State Programs

Federal Award Number and Year:

G1402MSTANF 2014
G1502MSTANF 2015

Questioned Costs: None

Oth-04 Controls Should Be Strengthened over the Data Collection and Submission of Required Federal Reporting Elements and Reports

Finding:

The *Code of Federal Regulations* (45 CFR Part 265.3) requires a "TANF Data Report" (ACF-199) to be filed quarterly by all states receiving assistance under the Temporary Assistance for Needy Families (TANF) grant. Each quarterly "TANF Data Report" should contain two sections of disaggregated data on a sample of TANF cases and two sections of aggregated data elements. The *Office of Management and Budget Circular A-133* compliance supplement lists key line items of the "TANF Data Report" which contain critical elements used by the Department of Health and Human Services - Administration for Children and Families Division (ACF) in evaluating work participation and other TANF program information.

When performing testwork related to TANF Reporting requirement as of June 30, 2015, the auditor reviewed the submitted ACF-199 reports and noted, of the 20 cases selected for review, one instance was noted in which the key line item number 17 (Receives Subsidized Child Care) reported that there was a child

receiving child care funded entirely or in part with Federal Funds when in fact the case does not have an active child care certificate.

The OMB Circular A-133 Compliance Supplement, Part 4 Department of Health and Human Services, TANF Cluster, Section L Reporting states the ACF-204 must contain information on the TANF program and the State's Maintenance of Effort (MOE) programs for that year, including strategies to implement the Family Violence Option, State diversion programs, and other program characteristics. Each State must complete the ACF-204 for each program for which the State has claimed basic MOE expenditures for the fiscal year. The total MOE expenditures reported on the ACF-204 for each program should equal the total MOE expenditures reported on the federal fiscal year fourth quarter ACF-196 TANF Financial Report.

The TANF 2014 ACF-204 is an annual report on the TANF program and the State's MOE programs for the fiscal year. States must complete the ACF-204 for each program for which the State has claimed basic MOE expenditures for the fiscal year. Two of the key items required to be included in the annual report are "Total State MOE Expenditures on each program" (claimed on the State's FFY fourth quarter 2013 ACF-196 TANF Financial Report) and "Number of Families Served with MOE Funds on each program" (calculated as a pro rata portion of total TANF grant awarded to percent of total MOE awarded).

The *Code of Federal Regulations* (45 CFR Part 75.341) grants the Health and Human Services awarding agency authority to require financial reporting for effective monitoring of federal awards. The Federal Financial Report (FFR) is required to be completed and submitted in accordance with instructions provided by the Administration for Children and Families, and must be submitted quarterly, semiannually or annually, based on instructions from the ACF and awarding agency. Those instructions require States to submit quarterly and semi-annual reports no later than 30 days after the end of each reporting period and annual reports no later than 90 days after the end of each reporting period or grant period end date.

Additionally, the *Office of Management and Budget Circular A-133* compliance supplement requires submitted reports agree to the reporting entity's accounting records that support the audited financial statements and the Schedule of Expenditures of Federal Awards.

During testwork performed for reporting requirements for TANF for fiscal year 2015, we noted the following exceptions:

- The 2014 ACF-204 reported "Administration" expenditures as $73,390 versus $62,971 as reported on the 2014 QE 9/30/14 ACF-196.
- The 2014 ACF204 reported "Other" expenditures as $0 versus $10,419 as reported on the 2014 QE 9/30/2014 ACF-196.
- Seven instances in which the "Total Number of Families Served" as calculated on the 2014 ACF-204 does not match as calculated on the 2014 QE 9/30/14 ACF-196.

- The Total Number of TANF Cases used to calculate the "Total Number of Families Served" in the 2014 ACF-204 was 104,130 versus the actual Total Number of TANF Cases of 104,328.
- $11,178 of expenditures allocated to the TANF program during the Cost Allocation Process were not reported on the FFR-425.

Good internal controls over reporting should include an independent review of information reported. Failure to review for anomalies in the data of reports could impact ACF's funding determinations.

Recommendation:

We recommend the Mississippi Department of Human Services (MDHS) strengthen controls over the accumulation of data via updating the computer program utilized in extracting data for the "TANF Data Report" to accurately capture key line item information regarding whether a Temporary Assistance for Needy Families case is required to participate in the TANF Work Program. We also recommend MDHS strengthen the controls over the preparation and review of the TANF ACF-204 annual report prior to submission to the Department of Health and Human Services.

ELIGIBILITY

Control Deficiency

93.558 Temporary Assistance for Needy Families State Programs

Federal Award Number and Year:

G1502MSTANF 2015

Questioned Costs: None

Oth-05 Controls Should Be Strengthened over Segregation of Duties and Granting Access to MAVERICS

Finding:

Good internal controls state that segregation of duties must be in place to help prevent and detect misappropriation of funds due to error or fraud. Because of the high percentage of employees with access to the Mississippi Application Verification Eligibility Reporting and Information Control Systems (MAVERICS), it is necessary to maintain controls over who can both enter and approve benefits so that an unnecessary risk to Mississippi Department of Human Services (MDHS) does not exist. MAVERICS serves as the primary TANF computer interface for Eligibility determinations for the State of Mississippi.

Under TANF Eligibility Determination Process in Chapter 7, Certification and Authorization, of the TANF policy published on the MDHS website, authorization is an official act, usually performed by the county director or their designee, certifying as to the eligibility or continuing eligibility of any assistance

payments group. The authorization requests the issuance of a TANF benefit and authorizes the expenditures of public tax funds.

Additionally, the MDHS Management Information Systems (MIS) Division policy states that system administrators will conduct Self-Audits of all user accounts on a semi-annual basis, at a minimum and that user accounts that have been inactive for 90 days or more will be disabled or deleted.

During testwork performed on MAVERICS User Access during fiscal year 2015, we noted the following weaknesses.

- Formal, written internal control policies were established during fiscal year 2015; however, these policies were not distributed or communicated to employees and contract workers.
- The Semi-Annual Spring 2015 RACF Self-Audit was not performed during fiscal year 2015.
- Of the 57 MAVERICS profiles examined, eleven did not have valid RACF profiles.
- Of the 57 MAVERICS profiles examined, eleven had security profiles that had been inactive for over 90 days without being disabled or deleted.
- Of the 57 MAVERICS profiles examined, three instances were noted in which the employee was terminated and the security profiles were not deleted at termination.
- Of the 57 MAVERICS profiles examined, one instance was noted in which the employee was terminated and neither the security profile nor RACF profile were deleted at termination.

Failure on the part of MDHS to strengthen controls could allow basic TANF benefits to be certified/approved by unauthorized personnel.

Recommendation:

We recommend the Mississippi Department of Human Services strengthen controls over access to the MAVERICS.

SUBRECIPIENT MONITORING

Control Deficiency

93.568 Low Income Home Energy Assistance Program
93.575 Child Care and Development Block Grant
93.596 Child Care Mandantory and Matching Funds of the Child Care Development Fund

Federal Award Number and Year:

G1201MSCCDF	2012	G13B1MSLIEA	2013
G1301MSCCDF	2013	G14B1MSLIEA	2014
G1401MSCCDF	2014		

Questioned Costs: None

Oth-06 Controls Should Be Strengthened over On-Site Monitoring

Finding:

The terms and conditions of the grant agreements between the Mississippi Department of Human Services (MDHS) and the U.S. Department of Health and Human Services require MDHS to administer grants in compliance with the Code of Federal Regulations (45 CFR Part 92). The Code of Federal Regulations (45 CFR Part 92.40) designates MDHS for managing the day-to-day operations of grant and subgrant supported activities. Grantees must monitor grant and subgrant supported activities to assure compliance with applicable Federal requirements and to ensure performance goals are being achieved. Grantee monitoring must cover each program, function or activity.

We evaluated MDHS's compliance with subrecipient monitoring requirements based on written policies and procedures designed by MDHS's Division of Program Integrity – Office of Monitoring (OM) to satisfy during-the-award monitoring requirements. OM procedures require an on-site monitoring review of each subgrantee contract at least once during the subgrant period. A tracking mechanism is used to ensure all subgrantee contracts are properly identified and monitored. Monitoring tools/checklists are used during each on-site monitoring review to provide guidance and to document a review was performed. The on-site monitoring workpapers are reviewed and approved by OM supervisory personnel prior to issuance of a written report, the Initial Report of Findings & Recommendations, which is used for communicating finding(s) and/or questioned costs to subgrantees. The written report should be issued within 30 working days from the date of the exit conference, which is normally held on the last day of the on-site review.

During testwork performed on subrecipient on-site monitoring for 19 subgrant contracts during state fiscal year 2015, we noted the following weaknesses:

- One contract tested, or five percent, was not monitored within the contract period as required by Program Integrity's Division of Monitoring procedures. Contract was monitored 58 days late.
- One contract, or five percent, in which the monitoring file had no evidence of the Programmatic Tool or Fiscal Monitoring Tool.
- During our verification of the completeness of the sample population of 115, we noted one additional contract on the FY14 tracking document (outside the parameters of our testing population) for which recorded monitoring date indicates that monitoring occurred subsequent to contract end date.

MDHS programmatic funding divisions rely upon OM monitoring procedures to verify compliance with program regulations and to identify potential problem areas needing corrective action. Failure to properly monitor subrecipients in a timely manner could allow noncompliance with federal regulations to occur and go undetected, potentially resulting in questioned costs.

ATTACHMENT- CRISIS AND EMERGENCY SERVICES

Mississippi offers a crisis assistance component through the Low Income Home Energy Assistance Program (LIHEAP). Specifically, The Energy Crisis Intervention Program (ECIP) provides assistance to low-income households that are in a crisis situation. Funds and financial assistance are made available year round to help individuals who are out of options, and who are therefore in a crisis situation. These individuals may be about to have their utility or heating service disconnected, they may have run out of heating fuel, are faced with extreme summer temperatures, or have some other emergency.

- Life Threatening Crisis Must be Relieved in 18 Hours
    - Eligible households with a life-threatening energy crisis, must have the crisis relieved within 18 hours of an approved application.
    - Resolution of a crisis include but are not limited to: arranging for an immediate supply of fuel, securing flexible payment arrangements with the energy supplier, pledging the benefit and therefore preventing shutoff, or purchase of portable space heater or air conditioner.
        - The Division of Community Services deems Life Threatening Crisis situations as:
            1. Natural disaster (Fire, tornado, flood, etc.), and extreme inclement weather conditions as determined by the National Weather Service
            2. Person(s) on life support or medical devices that require electricity
            3. Domestic Violence
            4. Elderly Abuse
- Non-Life Threatening Crisis Must be Relieved in 48 Hours
    - Eligible households with a non-life threatening energy crisis, must have the crisis relieved within 48 hours of an approved application.
    - Resolution of a non-life threatening crisis include but are not limited to: arranging for an immediate supply of fuel, securing flexible payment arrangements with the energy supplier, pledging the benefit and therefore preventing shutoff, or purchase of portable space heater or air conditioner.
        - The Division of Community Services deems Non-Life Threatening Crisis situations as:

1. Unexpected expense (Death of immediate family member, funeral expense, high medical expense, etc.)

2. Income loss within last 30 days due to layoff or consequences resulting in termination of benefits.

3. Services are disconnected for a household with children under six (6), elderly or disabled persons.

- Clients who are waiting on an approval/eligibility determination must be referred to other community organizations, programs that may be able to assist, emergency shelters/ hotels, and relationships should be established with energy vendors to prevent shut-off.

- Clients who are found ineligible for crisis benefits must be referred to other community organizations or other programs that may be able to help.

ATTACHMENT-ROMA ENTITY DEVELOPMENT GOALS

ATTACHMENT-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	1. Board in full compliance with laws governing composition; 2. Board and/or committees meet on regularly scheduled basis, with full attendance 50% of time; 3. Board actively works to design functional action plans to ensure staff and entity growth and development; 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; 5. Engages in on-going training on role and responsibilities; 6. Members enthusiastic about their role and mission of entity; works to strengthen entity in community.
		GOVERNANCE SAFE/SELF-SUFFICIENT	1. Board and/or committee meet on scheduled basis, with quorum in attendance 75% of time; 2. Action plans are followed to ensure entity/staff remain current in fiscal year; short range plans in effect; 3. Vision/mission reviewed annually; timely monitors/evaluates programs for compliance; 4. Board training is done at least bi-annually; 5. Board members cognizant of their role and act accordingly; support is shown to strengthen entity role in community.
		GOVERNANCE AT-RISK	1. No regularly scheduled committee meetings; lacks quorum at over 30% of board meetings; 2. Vision mission is unclear and unfocused; little monitoring/evaluation for program is done; 3. Board has no training schedule; most unsure of role; 4. No board action to support community awareness of entity.
		GOVERNANCE IN CRISIS	1. Board structure not in compliance with law or one-third requirement; 2. Board and/or committee meet irregularly or not at all; 3. No mission or vision established for entity; 4. No board training offered; no support for entity activities; no community awareness activities take place.

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	1. Vision and mission clear and are the focus of entity programs; 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; 3. Entity is strong and viable in community; set objectives are exceeded; constantly work to improve service results.
		MISSION INTEGRATION SAFE/SELF-SUFFICIENT	1. Vision and mission clear and are the focus of entity programs; reviewed annually to ensure community's needs are met; 2. Board and staff involved in set training and informed on issues that impact entity; programs are changed annually to meet set objectives; 3. Entity is well-known in community; programs in place to provide services according to vision/mission; 90% of program objectives are met.
		MISSION INTEGRATION STABLE	1. Vision/mission has been defined and service plans are being developed; 2. Board/staff involved in periodic training and informed on issues that impact entity; programs are reviewed and evaluated annually to meet objectives; 3. Community is aware of entity; 70% of program objectives are met.
		MISSION INTEGRATION AT-RISK	1. Vision/mission is fragmented and not in line with entity purpose; 2. Board/staff involved in some training; programs are reviewed/evaluated periodically; 3. Entity program are stretching staff capacity to function; 4. Community is aware of entity; some efforts are made to address concerns in community; 5. Community is not fully aware of entity; very little efforts are made to address concerns in community.

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	1. Entity has sufficient funds, both federal and private to support all existing entity operations; 2. Entity has adequate resources to support operations in face of cuts or elimination of one or more federal programs; 3. Entity has good public relation programs in place which results in wide spread community support; 4. Sound leadership and governance.
		ADMIN. & FISCAL HEALTH SAFE/SELF-SUFFICIENT	1. Entity has two or more income producing projects/collaborations that will lessen dependence on federal funds; 2. Entity leadership and governance is sound; 3. Entity working towards administrative and fiscal improvements.
		ADMIN & FISCAL HEALTH STABLE	1. Entity budget is 100% outlined, with comparative data on existing and needed resources for implementation; 2. Working partnerships in place to promote entity growth; 3. Entity is fiscally accountable with no serious monitoring or audit findings; 4. Entity vision and mission is clear; board and staff geared towards mission accomplishments.
		ADMIN. & FISCAL HEALTH AT-RISK	1. Entity has little or no community support; 2. Loss of any federal funds result in suspension or termination of services or reduction of staff; 3. Outside intervention may be needed to prevent serious accounting problems; 4. One or more serious audit findings.
		ADMIN. & FISCAL HEALTH IN-CRISIS	1. Entity leadership and governance is at odds; 2. Ability of administrative staff is insufficient to carry out direction of board; 3. Entity funding terminated due to non-compliance with procedures, regulations or ordinances; 4. Entity has problem with one or more funding sources; 5. Outside intervention is needed to prevent entity failure; 6. Entity is dependent on federal funding for over 100% of program operations; 7. Outside intervention is required to prevent entity failure.

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	1. Staff and board equally involved in planning/evaluation of all entity programs; programs mission driven; 2. Program goals and objectives are realistic in terms of entity/staff capacity and ability; 3. Programs meet all conditions for funding and are funded over 95% of times; 4. Programs rated as outstanding by outside source; often used as model programs.
		PLANNING AND EVALUATION SAFE/SELF-SUFFICIENT	1. Schedule for internal evaluation maintained and carried out on acceptable basis; 2. Community involvement requested and uses in formation of plans; 3. Programs meet all conditions for funding and are funded 90% of time; 4. Orientation/training for programs provided to board/staff; 5. Programs rated excellent by outside source; 6. Constantly seeking new funding sources based on community needs.
		PLANNING AND EVALUATION STABLE	1. Internal evaluation schedule is in place, but not properly followed; 2. Programs loosely based on actual community needs assessment; assessment not fully complete; 3. Program barely meet conditions of current funding sources; 4. Staff and board partially involved in planning and evaluation of programs; 5. Training is erratic; no technical assistance given; 6. Programs rated satisfactory by outside source; 7. Periodic training and technical assistance given.
		PLANNING AND EVALUATION AT-RISK	1. Board fails to approve program applications; 2. Plans are not tied to community needs; 3. No efforts are made to improve program design; 4. Community unaware of programs or their purpose; 5. Community not involved in planning.
		PLANNING AND EVALUATION IN-CRISIS	1. Board not involved in entity planning, possesses limited knowledge of entity programs and services; 2. Programs rarely, if ever, funded; never seeks new programs; 3. Plan, when made, not tied to community needs; 4. Program ineffective in solving problems for which designed to meet; 5. Board and staff not open to new ideas; unwilling to change.

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	1. Constant search for innovative funding sources; 2. Fund development include efforts to increase non-federal base; 3. Community has bought into entity funding needs, and support is high level; 4. Fund development committee functioning on regular basis; 5. Board place fund development high on list of entity priorities; 6. 5% annual increases of funding base.
		FUND DEVELOPMENT SAFE/SELF-SUFFICIENT	1. Board is actively involved in fund development; 2. Set goals for development in line with entity needs; 3. Projects future needs and plans accordingly; 4. Has increased local support by at least 1% over previous year.
		FUND DEVELOPMENT STABLE	1. Board annually reviews entity funding needs; 2. Safe priority for existing funds and goals for additional needs; 3. Entity plans including goals to decrease dependence on federal funds; 4. Entity has good local financial support.
		FUND DEVELOPMENT AT-RISK	1. Dependence on federal funds is extremely high; 2. Board has no viable plan for increasing funding base; 3. Sees no need to reduce federal level; 4. Local support is limited.
		FUND DEVELOPMENT IN-CRISIS	1. No plan for fund development; 2. Fund development is limited to crisis intervention management; 3. No local financial support of entity; 4. Fund development is not goal or high priority of entity; 5. Totally dependent on federal funds; 6. Sees no need to reduce dependency on federal funds.

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	1. Working collaboration/partnership with most all facets of community to fill service gaps; 2. Establish new partnerships – ten or more each year; 3. Entity is consistently approached by outside sources to form working partnerships; 4. Collaborations and partnerships substantially (5% or more) increasing financial base; 5. Established continuum of care for community in place.
		COLLAB. & PARTNERSHP SAFE/SELF-SUFFICIENT	1. Establishing five to ten new partnerships each year; 2. Community support of entity ventures extremely high; 3. Existing partnerships generating resources for entity; 4. Collaboration/partnership has potential of decreasing dependence on federal funds; 5. Actively working to establish a continuum of care.
		COLLAB. & PARTNERSHP STABLE	1. Has at least five working partnerships within community; 2. Support for entity programs above average; 3. Foundation is established to create continuum of care for community; 4. Local public/private support increased by at least 1% over previous year.
		COLLAB. & PARTNERSHIP AT-RISK	1. Establishing partnerships/collaborative agreements are not part of entity plans; 2. Community offers very limited support of entity/programs; has vague idea about entity purpose; 3. Entity has two or three existing partnerships in the community; 4. Very minimal public/private financial support.
		COLLAB. & PARTNERSHP IN-CRISIS	1. No plan or desire to establish partnerships with community; 2. Community offers no support for entity/programs; has no idea about entity purpose; 3. Entity has no existing partnership in community and/or partnerships has produced no viable resources for entity; 4. Totally dependent on federal funds.

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. SENSITIVILITY & COMPETENCE THRIVING	1. Entity has excellent record of employment individuals of diverse cultural and ethnic backgrounds; 2. Provides regular training to board and staff on cultural diversity and sensitivity; 3. Is recognized in community for efforts to promote unity and acceptance of all races; 4. Has strong entity policy prohibiting discrimination and any mistreatment of people; 5. Regularly monitors compliance of entity policies and strictly enforces violation.
		CUL. SENSITIVITY & COMPETENCE SAFE/SELF-SUFFICIENT	1. Has established policies which prohibits the mistreatment of individuals based on cultural differences, race, sex or religion preference; 2. Provides training to board and staff to promote cultural sensitivity; 3. Promotes inclusiveness through programs and activities; 4. Have fair and just hiring practices.
		CUL. SENSITIVIITY & COMPETENCE STABLE	1. Has made efforts in the community to recognize cultural diversity and promote sensitivity and awareness; 2. Meet all federal and state requirements of compliance against discrimination; 3. Has established and/or adopted policies to ensure entity compliance; 4. Have no complaints of discrimination or insensitivity.
		CUL. SENSITIVITY & COMPETENCE AT-RISK	1. Has made no efforts, nor taken stand in community to promote cultural diversity; 2. Has federal mandates against discrimination, but has no local entity or policy; 3. Has selective hiring practices; 4. Has no training for board and staff on cultural sensitivity; 5. Does not monitor staff action for compliance.
		CUL. SENSITIVITY & COMPETENCE IN-CRISIS	1. Has had numerous complaints for unfair hiring practices; 2. Does not investigate allegations of mis-conduct by board members or staff; 3. Has been in violation of federal and state non-discrimination laws; 4. Has poor record in community for advocacy.

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	1. Entity is viable in community and considered a major employer; 2. Has several ventures to improve the condition of community and its economic base; 3. Actively works to remove a condition which stifle the productive development of residents; 4. Has stake in community and commits resources towards its development.
		COMM. DEV. IMPACT SAFE/SELF-SUFFICIENT	1. Has established long-term goals for community development; 2. Board and staff work to change conditions in community which prohibits growth; 3. Has achieved short-term and established long-term goals for community development.
		COMM. DEV. IMPACT STABLE	1. Entity working toward meeting short-term community development goals.
		COMM. DEV. IMPACT AT-RISK	1. Goals for community development set, but there is no viable impact in community; 2. Community support limited.
		COMM. DEV. IMPACT IN-CRISIS	1. Entity has not included community development as part of mission; 2. No set goals for community development; 3. Has no community involvement or support.

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	1. Clients readily show appreciation of entity for services offered; 2. Clients feel complete confidence in entity and its ability and willingness to help; 3. Clients are fully knowledgeable of entity services; 4. Entity service to clients rated as excellent or outstanding by funding sources and clients alike.
		CLIENT SATISFACTION SAFE/SELF-SUFFICIENT	1. Entity set high priority on client involvement; 2. Goals for entity include client satisfaction; 3. Bi-annual evaluations are done to measure degree of success; 4. Entity is well known in community; 5. Entity has established partnerships to increase its capacity to meet client's need.
		CLIENT SATISFACTION STABLE	1. Clients are involved in entity planning process; 2. Workers seek to meet client's need in comfortable environment; 3. Regular program evaluation is done to ensure compliance; 4. Clients feel good about entity and believe their needs will be met.
		CLIENT SATISFACTION AT-RISK	1. Entity has own agenda, of which client services is not a high priority; 2. Clients are hesitate to request assistance; 3. Entity does not welcome client input in planning process; 4. Program evaluation is seldom done.
		CLIENT SATISFACTION IN-CRISIS	1. Community needs assessment are not done; 2. Programs are designed without client input; 3. Clients not informed of available services; 4. Clients made to feel uncomfortable in asking for services; 5. Worker's attitude is negative; 6. Clients do not feel entity can or will meet their needs; 7. Entities capacity to achieve results for clients is non-existent.

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	1. Entity no longer dependent on federal funds for operation; 2. Fund development efforts generate working capital; 3. Board and staff morale at high level; 4. Self-sufficiency goals updated annually; 5. Entity has total community support.
		SELF-SUFFICIENCY IMPACT SAFE/SELF-SUFFICIENT	1. Entity has working partnerships in community which generate funds; 2. Excellent community support; 3. Long-term goals established to remove dependence on federal funds; 4. Board and staff actively working on plan; 5. Entity supporting over 50% of operating costs.
		SELF-SUFFICIENCY IMPACT STABLE	1. Entity has good community support; 2. Receives local funds from community; 3. Has developed plan for increasing funding base; 4. Board and staff actively involved in plans; 5. Have decreased some dependence on federal funds.
		SELF-SUFFICIENCY IMPACT AT-RISK	1. Makes no efforts to increase funding base; 2. Has no long-term goals for self-sufficiency; 3. Heavily dependent on federal funds; 4. Community support limited.
		SELF-SUFFICIENCY IMPACT IN-CRISIS	1. Board and staff have low morale; 2. Board and staff set inappropriate priorities; 3. Entity totally depended on federal funds; 4. Has no support in community.

CSBG Outcome Indicator Measurement Goals

Instructions: Based on your Community Strengths and Needs Assessment (CSNA), tentative allocations and the number of clients assisted in FY 2016, project the number of individuals you will assist for FY 2017 in the below categories.

Goal 1: Low-Income People Become More Self-Sufficient

1.1 Employment

_____ Unemployed and obtained a job.

_____ Employed and maintained a job for at least 90 days.

_____ Employed and obtained an increase in employment income and/or benefits.

_____ Achieved "living wage" employment and/or benefits.

_____ **Total Employment**

1.2 Employment Supports

_____ Obtain pre-employment skills/competencies required for employment.

_____ Complete ABE/GED and received certificate or diploma.

_____ Complete post-secondary education program and obtained certificate or diploma.

_____ Enroll children in before or after school programs.

_____ Obtain care for child or other dependent.

_____ Obtain access to reliable transportation and/or driver's license.

_____ Obtain health care services for themselves or family member.

_____ Obtain safe and stable housing.

_____ Obtain food assistance.

_____ Obtain non-emergency LIHEAP energy assistance.

_____ Obtain non-emergency Weatherization energy assistance.

_____ Obtain other non-emergency energy assistance (State/local/private energy programs.

_____ **Total Employment Supports**

1.3 Economic Asset Enhancement and Utilization

_____ Number of participants in tax preparation programs who identify any type of Federal or State tax credit and the aggregated dollar amount of credits.

_____ Number of participants demonstrating ability to complete and maintain a budget for over 90 days.

_____ Number and percent opening an Individual Development Account (IDA) or other savings account.

Of participants in a Community Action assets development program (IDA and others):

_____ Number and percent of participants capitalizing a small business with accumulated savings.

_____ Number and percent pursuing post-secondary education with accumulated savings.

_____ Number and percent purchasing a home with accumulated savings.

_____ Number and percent of participants purchasing other assets with accumulated savings.

_____ **Total Economic Asset Enhancement and Utilization**

Goal 2: The Conditions in Which Low-Income People Live are improved

2.1 Community Improvement and Revitalization

_____ Jobs created, or saved, from reduction or elimination in the community.

_____ Accessible living wage jobs created, or saved from reduction or elimination in the community.

_____ Safe and affordable housing units in the community.

_____ Safe and affordable housing units preserved or improved through construction, weatherization or rehabilitation achieved by community action activity or advocacy.

_____ Accessible and affordable health care services/facilities for low- income people created or saved from reduction or elimination.

_____ Accessible safe and affordable childcare or child development placement opportunities for low-income families created or saved from reduction or elimination.

_____ Accessible before school and after school program placement opportunities for low-income families created or saved from reduction or elimination.

_____ Accessible new or expanded transportation resources, or those that are saved from reduction or elimination, that are available to low-income people, including public or private transportation.

_____ Accessible or increased educational and training placement opportunities, or those that are saved from reduction or elimination, that are available for low-income people in the community, including vocational, literacy, and life skill training, ABE/GED, and postsecondary education.

_____ **Total Community Improvement and Revitalization**

2.2 Community Quality of Life and Assets

_____ Increase or preservation of neighborhood quality of life resources.

2.3 Community Engagement

_____ Number of community members mobilized by Community Action that participate in community revitalization and anti-poverty initiatives.

_____ Number of volunteer hours donated to the agency.

_____ **Total Community Engagement**

Goal 3: Low-Income People Own a Stake in Their Community

3.1 Community Enhancement through Maximum Feasible Participation

_____ Number of low-income people acquiring businesses in their community as a result of community action assistance.

_____ Number of low-income people purchasing their own homes in their community as a result of community action assistance.

_____ Number of low-income people engaged in non-governance community activities or groups created or supported by community action. (i.e., Boys & Girls Club, Sororities/Fraternities, Church Programs, etc.)

_____ **Total Community Enhancement through Maximum Feasible Participation**

Goal 4: Partnerships Among Supporters and Providers of Service to Low-Income People are Achieved

4.1 Expanding Opportunities through Community-Wide Partnerships

_____ Non-profit organizations

_____ Faith Based

_____ Local Government

_____ State Government

_____ Federal Government

_____ For-Profit Business or Cooperation

_____ Consortiums/Collaboration

_____ Housing Consortiums/Collaboration

_____ School Districts

_____ Institutions of Post-Secondary Education/Training

_____ Financial/Banking Institutions

_____ Health Service Institutions

_____ State wide associations or collaborations

_____ **Total Expanding Opportunities through Community-Wide Partnership**

Goal 5: Agencies Increase Their Capacity to Achieve Results

5.1 Agency Development

_____ Number of Nationally Certified ROMA Trainers

_____ Number of Family Development Certified Staff

_____ Number of Child Development Certified Staff

_____ Number of staff attending trainings

_____ Number of board members attending trainings

_____ Hours of staff in trainings

_____ Hours of board members in trainings

_____ **Total Agency Development**

Goal 6: Low-Income People, Especially Vulnerable Populations, Achieve Their Potential by Strengthening Family and Other Supportive Systems

6.1 Independent Living

_____ Senior Citizens

_____ Individuals with Disabilities (Ages: 0-17; 18-54 and 55 and over)

_____ **Total Independent Living**

6.2 Emergency Assistance

_____ Food

_____ Emergency vendor or utility payments funded by LIHEAP or other public and private funding sources.

_____ Emergency Rent or Mortgage Assistance

_____ Emergency Car or Home Repair

_____ Emergency Temporary Shelter

_____ Emergency Medical Care

_____ Emergency Protection from Violence

_____ Emergency Legal Assistance

_____ Emergency Transportation

_____ Emergency Disaster Relief

_____ Emergency Clothing

_____ Other: _____

_____ **Total Emergency Assistance**

6.3 Child and Family Development

_____ Infants and children obtain age appropriate immunizations, medical and dental care.

_____ Infant and child health and physical development are improved as a result of adequate nutrition.

_____ Children participate in pre-school activities to develop school readiness skills.

_____ Children who participate in pre-school activities are developmentally ready to enter Kindergarten or 1st Grade.

_____ Youth improve physical health and development.

_____ Youth improve social/emotional development.

_____ Youth avoid risk-taking behavior for a defined period of time.

_____ Youth have reduced involvement with criminal justice system.

_____ Youth increase academic, athletic or social skills for school success by participating in before or after school programs.

_____ Parents and other adults learn and exhibit improved parenting skills.

_____ Parents and other adults learn and exhibit improved family functioning skills.

_____ **Total Child and Family Development**

6.4 Family Supports (For Seniors, Disabled and Caregivers)

_____ Enroll children in before or after school programs

_____ Obtain care for child or other dependent

_____ Obtain access to reliable transportation and/or driver's license

_____ Obtain health care services for themselves or family member

_____ Obtain safe and affordable housing

_____ Obtain food assistance

_____ Obtain non-emergency LIHEAP energy assistance

_____ Obtain non-emergency WX energy assistance

_____ Obtain other non-emergency energy assistance (State/local/private energy programs. Do Not Include LIHEAP or Weatherization)

_____ Other: _____

_____ **Total Family Supports**

6.5 Service Counts

_____ Food Boxes

_____ Pounds of Food

_____ Units of Clothing

_____ Rides Provided

_____ Information and Referral Calls

_____ Other: _____

_____ **Total Service Count**