# MISSOURI
# DEPARTMENT OF SOCIAL SERVICES

# AMERICAN REINVESTMENT AND RECOVERY ACT OF 2009

# COMMUNITY SERVICES BLOCK GRANT (CSBG) PLAN

DRAFT

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## I. Federal Fiscal Year or Years Covered by this CSBG Recovery Act Plan

FFY 2009
FFY 2010

## II. Letter of Transmittal

See Appendix A.

## III. Executive Summary

### A. CSBG State Legislation

State statutory authority for Missouri's Community Services Block Grant (CSBG) program is found at RSMo 660.370 to 660.376. The statute in part defines a community action program as a community based and operated program which includes intake, assessment and referral capability in each of its counties and is designed to include a number of projects or components to provide a range of services and activities having a measurable and potentially major impact on causes and conditions of poverty in the community. The statute restates Community Action program services and activities as outlined in the Coats Human Services Reauthorization Act of 1998, P.L.105-285. In addition, the statute provides a definition for Community Action Agency, addresses the composition, number and duties of Community Action Agency Board of Directors and the distribution of funding.

In Missouri all eligible entities are Community Action Agencies. Missouri has 19 eligible entities or Community Action Agencies.

### B. Designation of Lead State Agency to Administer the CSBG Program

Missouri's statutory authority identifies the Department of Social Services (DSS) as the lead agency. Gubernatorial signature is required for Missouri legislation to become law. The Governor signed the legislation. Governor Jeremiah W. (Jay) Nixon has designated the Missouri Department of Social Services to administer the CSBG Program. Please refer to Appendix B.

**Designated State Lead Agency:** Department of Social Services

**Director of Designated Lead Agency:** Ronald J. Levy

The Director has placed the program in the Family Support Division (FSD) where it is administered by the CSBG Unit.

### C. Public Hearing Requirements

#### (1) Pubic Hearing

In accordance with the public inspection and public hearing requirements of the CSBG Act, a public hearing was held at the Governor's Office Building in Jefferson City, Missouri, on July 27, 2007, in preparation for the FFY2008 and FFY2009 CSBG State Plan. Statewide notice of public review and comment was through statewide newspaper public hearing notices, the Missouri government website, posted notices, and other state hearing notification methods.

#### (2) Public Inspection of State Plan

Missouri's draft State Plan for the Recovery Act of 2009 was made available for public inspection and comment from May 21, 2009. Notices were placed on the Missouri Department of Social Services and Governor's Transform Missouri Initiative websites. In addition, the draft CSBG Recovery Act Plan was sent to all eligible entities. Public inspection documentation is included as Appendix C.1.

Comments were received and reviewed by the FSD and are included as Appendix C.2.

## IV. Statement of Federal and CSBG Assurances

### A. Assurances

#### (1) Programmatic Assurances

See Appendix D.

#### (2) Administrative Assurances

See Appendix D.

#### (3) Other Administrative Certifications

See Appendix D.

### B. Additional CSBG Recovery Act Assurance

See Appendix E.

## V. The Narrative State Plan

### A. Administrative Structure

#### (1) State Administrative Agency

(a) The Department of Social Services' mission is to maintain or improve the quality of life for Missouri citizens.

The values of the agency are:

- Accountability in the provision of effective and efficient services;
- Child safety and well being that recognize the family as the child's primary resource;
- Quality health care provided in the least restrictive setting;
- Respect for the dignity and diversity of every individual;
- Excellence in the quality of services provided to our citizens; and
- Staff committed to professional development, innovation and teamwork.

The core functions of the Department of Social Services are:

- Child Protection,
- Youth Rehabilitation,
- Access to Quality Health Care,
- Maintaining and Strengthening Families, and
- Helping Individuals Become Self-Supporting.

The Department of Social Services offers programs and services to Missourians to:

- Secure the health and general welfare of Missourians;
- Promote, safeguard and protect the social well-being and general welfare of children;
- Help maintain and strengthen family life; and
- Provide needs-based services to aid needy persons to achieve an appropriate level of self-support and self-care.

The Department's responsibilities are fulfilled through four program divisions; MO HealthNet, Youth Services, Family Support and Children's Division and two administrative divisions; Division of Finance and Administrative Services and Legal Services.

The Department Director has placed CSBG in the Family Support Division. This Division has responsibility for many federal and state programs connected to the purpose and mission of the CSBG.

CSBG is located in the Income Maintenance section with Temporary Assistance, Food Stamps, Medical Assistance, Food Distribution, Low-Income Home Energy Assistance Program, and Refugee Resettlement.

**(2) Eligible Entities**

(a) CSBG funds are allocated to 19 Community Action Agencies which serve all 114 counties in Missouri and the city of St. Louis. A list of eligible entities is included in Appendix F.

(b) A map showing the geographic areas served is included in Appendix G.

**(3) Distribution and Allocation of Funds**

(a) In accordance with the Recovery Act, at least ninety-nine percent of the CSBG funds will be distributed to 19 eligible entities. Allocations to eligible entities will be based on a formula as described below.

## B. Description of Criteria and Distribution Formula

Missouri's fund distribution formula for the period covered by the Recovery Act will be based on the formula used for distribution of "regular" CSBG funds used in FFY09. No changes will be made to the formula for distribution of Recovery Act funds. The formula is comprised of fifty percent poverty population of the area for which the eligible entity serves in relationship to the total poverty population in the state, and fifty percent historical funding and other factors. The only "other" factor considered is a base amount considered the minimum amount necessary for an eligible entity to carry out the purposes of the CSBG statute.

Missouri is set to receive a total CSBG Recovery Act allocation of $27,668,456. Services must be provided on or before September 30, 2010. The planned distribution of Recovery Act funds allocated to eligible entities is demonstrated in Table 1. DSS will distribute at least ninety-nine percent of the funding to Missouri's 19 eligible entities.

Table 1.

| Eligible Entity (Community Action Agency-CAA) | Distribution of Recovery Act Funds |
|---|---|
| Central Missouri Community Action | $1,287,413 |
| Community Action Agency of St. Louis County | $2,287,213 |
| Community Action Partnership of Greater St. Joseph | $569,749 |
| Community Services Inc. of Northwest Missouri | $517,704 |
| Delta Area Economic Opportunity Corporation | $1,690,072 |
| East Missouri Action Agency | $1,109,367 |
| Economic Security Corporation of Southwest Area | $936,799 |
| Green Hills Community Action Agency | $851,884 |
| Human Development Corp. of Metropolitan St. Louis | $5,645,444 |
| Jefferson-Franklin Community Action Corporation | $673,838 |
| Missouri Ozarks Community Action Incorporated | $1,038,148 |
| Missouri Valley Community Action Agency | $849,145 |
| North East Community Action Corporation | $1,216,195 |
| Northeast Missouri Community Action Agency | $517,704 |
| Ozark Action, Incorporated | $890,233 |
| Ozarks Area Community Action Corporation | $2,133,819 |
| South Central Missouri Community Action Agency | $865,580 |
| United Services Community Action Agency | $3,226,751 |
| West Central Missouri Community Action Agency | $1,084,714 |
| TOTAL | $27,391,772 |

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

Missouri shall reserve one percent, or approximately $276,000 of its Recovery Act funds for benefits enrollment coordination activities relating to the identification and enrollment of eligible individuals and families in federal, state, and local benefit programs. Pending approval from Health and Human Services (HHS), FSD shall develop in conjunction with the Missouri Community Action Network (all 19 eligible entities and the Missouri Association for Community Action (MACA)), a detailed benefit enrollment plan. The plan will include details about how eligible entities will work to increase awareness of existing and Recovery Act programs and coordinate with a variety of organizations, funders and communities. The plan will include activities to reach Missourians with incomes between 125 percent and 200 percent of federal poverty guidelines, as issued by the Secretary of HHS. In addition, FSD will coordinate the use of one percent restricted funds with MACA's activities funded by HHS, Office of Community Services under the CSBG Training and Technical Assistance Program: Capacity-Building for Ongoing CSBG Programs and Strategic Planning for Coordination Supported by the American Recovery and Reinvestment Act of 2009.

FSD will coordinate with the Missouri Community Action Network and other partners across the State in various ways to increase awareness and understanding of existing and Recovery Act programs as well as establish plans for sustainability of certain Recovery Act programs. This coordination may include working with and providing support to existing or new community councils, unmet needs committees, or other local community coalitions.

FSD will coordinate with 2-1-1 Missouri and 2-1-1 Kansas City operated by United Way so access to CSBG Recovery Act programs and services is achieved.

Finally, Missouri's 19 eligible entities have a long history and extensive skills in providing intake, assessment, follow-up and referral. All 19 eligible entities have an existing system to provide these services in all 114 Missouri counties and the city of St. Louis. Eligible entities will use a portion of their CSBG Recovery Act funds to provide intake, assessment, follow-up and referral to the many new clients coming in due to the economic downturn.

## D. State Community Services Program Implementation

**(1) Program Overview:** Each Missouri eligible entity submits a Community Action Plan as part of the contracting process with FSD. As part of that plan, eligible entities must describe their service delivery system, linkages, coordination with other public and private resources and how they will support innovative community and neighborhood-based initiatives. In this way Missouri complies with Section 676(b) (3) of the Act.

### (a) The Service Delivery System

CSBG funds will be allocated to 19 eligible entities (Appendix F). All 114 counties and the city of St. Louis are covered by the 19 eligible entities operating in Missouri. A map of the geographic area covered by each eligible entity is labeled as Appendix G.

Eligible entities provide services to low-income persons and communities through service centers in each Missouri county. These service centers serve as “front doors” for the delivery of CSBG services and other eligible entity services. They provide for the best possible interaction between eligible entities, low-income people, other community based groups and the community at large.

A Missouri eligible entity is a community based and operated program which includes intake, assessment and referral capability in each of its counties and is designed to include a number of projects or components to provide a range of services and activities

having a measurable and potentially major impact on causes of poverty in the community.

Missouri eligible entities have been in the process of rethinking the design of their service delivery systems in order to increase the level of integration among programs. This has resulted in a variety of changes such as agencies securing new facilities that accommodate Head Start classes and space for other eligible entity programs at one location. Several eligible entities operate Work Force Investment Act (WIA) programs and have offices in One-Stop Career Centers that are seeing ever increasing numbers of individuals impacted by the economic downturn and in need of Recovery Act programs.

FSD will utilize the 1 percent benefit enrollment funds to support state-wide activities that will aide eligible entities and their local partners in connecting citizens to needed services.

At the local level eligible entities will use their CSBG Recovery Act funds and existing CSBG funds to continue to support a system of comprehensive intake, assessment and referral.

**(b) Description of Recovery Act Projects**

Based on feedback provided by Missouri's 19 eligible entities FSD will increase family eligibility for CSBG services for program FFY 2009 and FFY 2010 from 125 percent of the official poverty guidelines as set by the U.S. Department of Health and Human Services to 200 percent.

In anticipation of receiving CSBG Recovery Act funding, FSD met with over 60 leaders from Missouri's 19 eligible entities for preliminary analysis and identification of current needs and services. Missouri's leaders indicated a significant increase in clients and a variety of issues and concerns. Some of the results of this preliminary analysis are listed below:

**Basic Needs:** Major strains on some communities' basic needs systems such as food banks, shelters, rent programs, health care and child care centers. Food assistance has become a priority need. It was suggested by meeting attendees that Community Action should gather information from programs that address food needs and coordinate services. Other basic needs such as requests for rent and mortgage assistance have increased. Agencies are seeing more requests for assistance with water payments and even car payments.

**Debt/Finances/Bankruptcy:** People are falling behind on mortgages, health care obligations, car, and credit card payments. There is limited help for mortgages, but even fewer options for other kinds of debt problems.

**Health:** Due to loss of employment as well as reduction of health insurance benefits for working families, there are many more people with health issues that are not being met.

**Transportation:** Transportation continues to be a problem in both rural and urban areas. Helping people keep their vehicles running or from being repossessed is a real need. Getting people to where the jobs are continues to be a problem.

**Education and Training**: There are not enough training dollars to assist the large number of unemployed. Agencies want to support people getting job training that will help them be more competitive in the future job market. Many people are interested in pursuing training or obtaining a GED since they are unable to find employment.

**Employment**: Many unemployed persons are coming in, but there are no jobs available to refer them to. Workers in some of the lowest skilled, low-wage positions are often the first to be laid off. WIA Rapid Response Programs often do not reach these workers. Community Action should consider the unemployed with limited skills, minorities, etc…

**New Customers:** New people are coming into Community Action Agencies for assistance. Many of these people have never needed assistance before. There is a need to get information out to this new population.

The purpose of the Recovery Act is to provide a necessary boost to the economy in these difficult times and to create jobs, restore economic growth, and strengthen the middle class. In CSBG Information Memorandum, Transmittal No. 109 the U.S. Department of Health and Human Services (HHS) encourages states and eligible entities to focus their efforts on creating sustainable economic resources in communities. HHS indicates states should help to ensure eligible entities:

> 1) provide a wide range of innovative employment-related services and activities tailored to the specific needs of their community;

2) use funds in a manner that meets the short-term and long-term economic and employment needs of individuals, families and communities; and

3) make meaningful and measurable progress toward the reform goals of the Recovery Act with special attention to creating and sustaining economic growth and employment opportunities.

HHS indicates that Recovery Act funds can be used for CSBG program services addressing employment, education, better use of available income, housing, nutrition, and emergency services to combat the central causes of poverty. In order to achieve the goals and results being outlined, it is necessary to recognize job creation, economic growth and advancement toward the middle class are not achieved overnight, or with simple, single strategies.

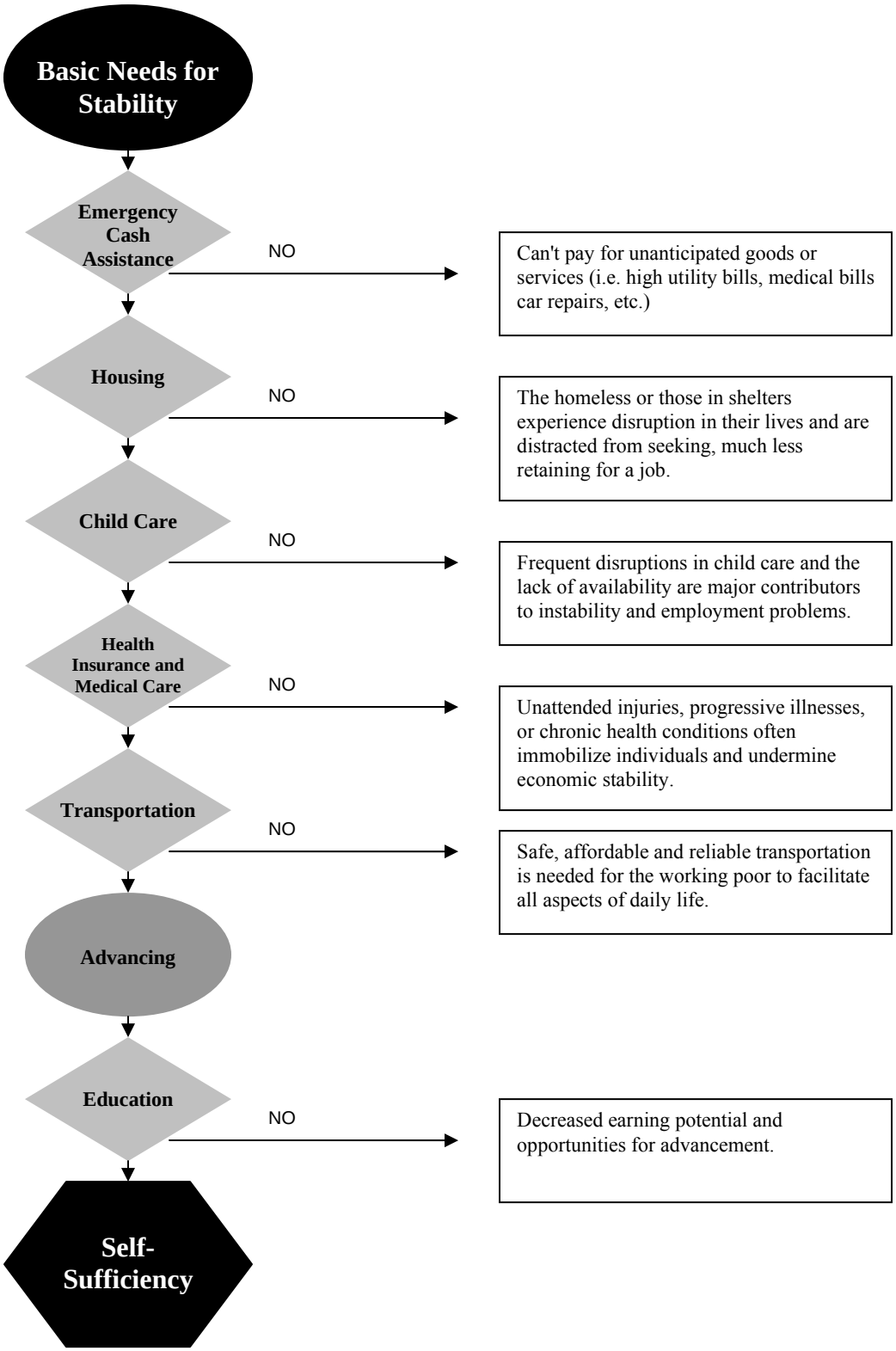
Based on experience and knowledge of the complicated and multi-layered issues connected to job creation and individual and family advancement, a working group of eligible entities and FSD staff identified two conceptual frameworks. FSD is proposing the following two conceptual frameworks for focusing Missouri's CSBG Recovery Act funds. The programs, activities, results and measures supported with CSBG Recovery Act funds will address concepts of one or both of the following frameworks. For example, the CAA may determine, based on their assessment, that in order to increase the potential for job creation, human capital must be improved. As a result of their assessment and analysis, the agency determines to use CSBG Recovery Act funding to convene community stakeholders from business, education, and government to design a new workforce bridge program that creates a career path to a specific occupational sector with identified future growth. In another example, the CAA may determine, based on their assessment, that jobs are available in the community, but their clients do not have reliable transportation to get to them. As a result of this agency's assessment and analysis, they plan to use CSBG Recovery Act funding to provide cash loans to working families to purchase reliable transportation. In both these examples, CSBG Recovery Act funds are used to address concepts that are essential for advancing working families and creating economic growth.

***Working Families Interrelatedness of Needs Framework***

The first conceptual framework comes from a report the Missouri Community Action Network produced titled Planning for Services Integration to Support Working Poor Families. This report

outlines the services and supports that working families need to achieve stable and functional lives, including sustained employment and economic advancement. The report also demonstrates the interrelatedness and relative importance of these needs and services. Over forty years experience has lead to an understanding in the Community Action Network that in order for working families to retain or gain jobs they need a level of stability in their daily lives that is built on having certain supports or conditions in place at all times. These supports are often interrelated and connected in ways that are often not evident. The chart on the following page demonstrates the interrelatedness of needs and supports that are critical for stabilizing and advancing working families.

# THE INTERRELATEDNESS OF NEEDS

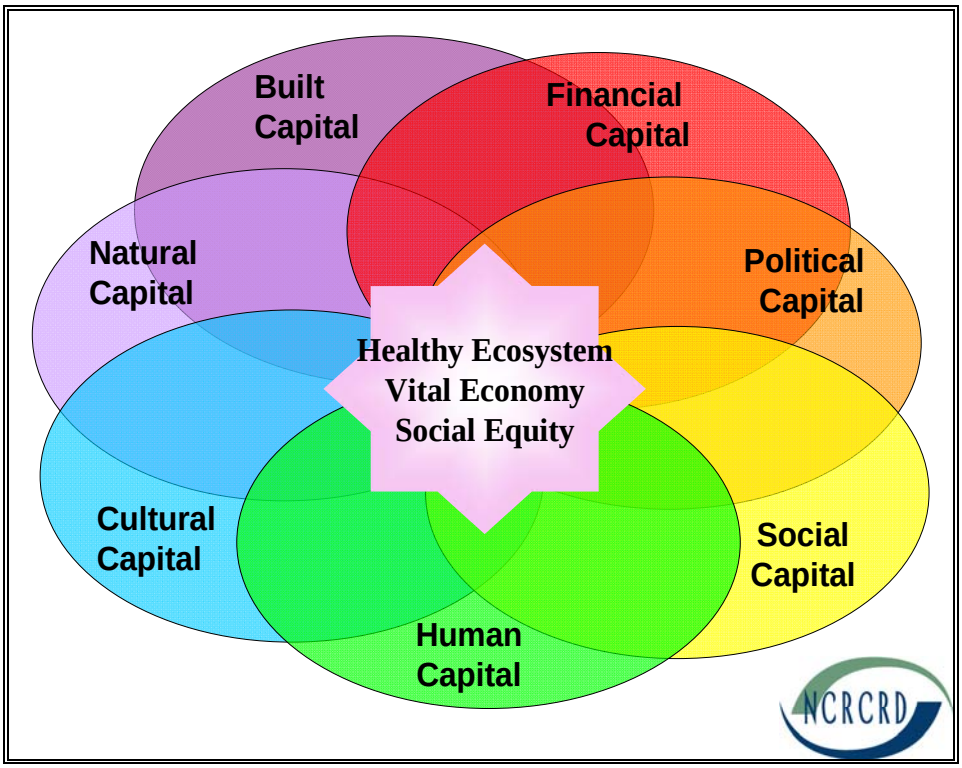



*Planning for Service Integration to Support Working Poor Families, September 2003*

***Community Capitals Framework***

The second conceptual framework uses the Community Capitals Framework (CCF). The CCF was developed by Flora and Flora (2004) to understand how communities function. They determined that the success of communities in supporting healthy sustainable communities and economic development is dependant on seven types of capital:

**COMMUNITY CAPITALS**




**North Central Regional Center for Rural Development**

*Natural Capital*: Air quality, land, water and water quality, natural resources, biodiversity, scenery;
*Cultural Capital*: Values, heritage, recognition and celebration;
*Human Capital*: Population, education, skills, health, creativity, youth, diverse groups;
*Social Capital*: Trust, norms of reciprocity, network structure, group membership, cooperation, common vision and goals, leadership, depersonalization of politics, acceptance of alternative views, diverse representation;
*Political Capital*: Level of community organization through the use of government; ability of government to garner resources for the community;

*Financial Capital:* Tax burden/savings, state and federal tax monies, philanthropic donations, grants, contracts, regulatory exemption, investments, reallocation, loans, poverty rates; and *Built Capital*: Housing, transportation, infrastructure, telecommunications infrastructure and hardware, utilities, buildings.

A central element of the CCF is the interaction among the seven capitals, just like the interrelated nature of the work supports identified in the Working Families Interrelatedness of Needs Framework.

During the months of June and July 2009, FSD will assist all 19 eligible entities in using the Working Families Interrelatedness of Needs Framework and the Community Capitals Framework to give context to the work to be supported by CSBG Recovery Act funds. In this way the State and HHS will be assured that CSBG Recovery Act funds are being used for the purposes and intent outlined in the Recovery Act.

As a condition of funding, each eligible entity shall be required to submit a CSBG Recovery Act Community Action Plan that shall include:

1) A separate work plan for CSBG Recovery Act funded programs;
2) A projected list of partners and linkages for Recovery projects and benefits enrollment coordination efforts;
3) A separate Results Oriented Management and Accountability (ROMA) target report; and
4) A projected CSBG Supplemental Audit Schedule.

Based on preliminary discussions with eligible entities, it is expected that many existing services such as the ones listed below will be expanded to meet increased demands:

Intake/Assessment/Follow-Up and Referral,
Family Crisis Response,
Family Support (Case Management),
Life Skills,
Step-Up to Leadership Training,
Poverty Awareness/Poverty Simulation, or
Local Community Collaborations.

All expanded and new programs will be provided within the context of the Working Families Interrelatedness of Needs Framework and/or Community Capitals Framework which will assure goals and objectives of the Recovery Act for CSBG are met.

The State's CSBG Recovery Act Plan will require each eligible entity to include the following strategy in their Recovery Act Community Action Plan:

Community Empowerment Collaborations: Eligible entities will facilitate the development of local collaborations to research, analyze and address local community and economic development issues as well as develop local solutions to increase economic growth. In addition, these groups will focus on making local community members aware of Recovery Act funded services and address Recovery Act sustainability issues by creating strategic plans to respond to ongoing community needs. These collaboratives will consist of a variety of representatives from government, business, civic, and non-profit organizations.

Missouri's CSBG program provides for a local response to the identified needs and the conditions of poverty experienced by all Missouri citizens who are impoverished. The program is directed at removing the obstacles and solving the problems that prevent people from becoming self-sufficient. The goal is to have a measurable and potentially major impact on causes of poverty in the community through the reduction of poverty, the revitalization of low-income communities, and the empowerment of low-income families and individuals and may help the families and individuals to achieve self-sufficiency.

Eligible entities are required to implement a mix, appropriate to address the problems in their areas, of the following local initiative projects to address locally identified causes of each poverty condition identified by the CSBG Act.

*Community Coordination/Resource Development*
Institutional Partnerships
Collaboration Networks
Revitalization Coalitions
*Family Development*
Family Intake/Assessment/Referral/Follow-Up
Family Crisis Response
Family Support
Local Initiative Supplements

Most poverty causes are unique to respective geographic areas. Local Initiative gives local communities the flexibility to develop projects that address unique local causes. In this way CSBG projects become hometown guides toward self-sufficiency operated by local people for the benefit of their neighbors. CSBG

projects then can solve community problems, benefit local people, and enhance local economic development.

**(c) The Service Delivery System for Recovery Act Projects**

The State of Missouri has 19 eligible entities; all are Community Action Agencies (CAA). All 19 CAAs are non-profit community based organizations. These 19 CAAs are the existing CAAs receiving federal anti-poverty funding since 1981, when Missouri implemented the CSBG. Since the CSBG Recovery Act requires ninety-nine percent of funds shall be distributed to eligible entities, the 19 Missouri CAAs will deliver CSBG Recovery Act services. Missouri's 19 CAAs cover all 114 counties and the city of St. Louis so services will be accessible in all areas of the State.

FSD requires all CAAs to conduct a local Community Needs Assessment and conduct a strategic planning process that identifies goals, measures and strategies to address local community priorities. A wide range of innovative services and activities will be provided.

**(d) Linkages**

In their FFY08 and FFY09 Community Action Plans all 19 eligible entities provided information on the linkages they would establish to fill identified gaps in services through information, referral, case management, and follow-up consultations.

As part of the CSBG Recovery Act Community Action Plan, each CAA will provide a projected list of partners and linkages for Recovery Act projects.

Missouri eligible entities are required to implement a mix of the following local initiative projects to address gaps in services, develop linkages with a range of public and private organizations, meet the individual needs of low-income families and communities and achieve measurable results:

Community Coordination/Resource development (Institutional Partnerships, Collaboration Networks, Revitalization Coalitions);
Family Development (Family Intake/Assessment/Referral, Family Crisis Response, Family Support, Local Initiatives).

Refer to the Missouri FFY08 and FFY09 CSBG Program Plan (Appendix H) for a complete description of these strategies.

All 19 Missouri eligible entities provide intake, referral, case management and follow-up.

**(e) Coordination with Other Public and Private Resources**

Eligible entities in Missouri routinely coordinate CSBG funding with other public and private resources through the involvement and assistance of diverse Boards made up of local elected officials, representatives of the low-income community and private sector representatives from faith based organizations, business, labor, civic groups, law enforcement and other community groups.

Eligible entities have established or participate in a variety of community collaborations that focus on coordinating and leveraging resources and improving the delivery of services in local communities. In FFY08 Missouri eligible entities leveraged $221,817,250 in federal, state, local, and private resources to assist low-income families and communities. CSBG funds were approximately seven percent of the total resources available in Missouri's 19 eligible entities. In most cases CSBG was used in conjunction with other resources or established a foundation that allowed agencies to obtain additional resources.

In their Community Action Plans all 19 eligible entities provide information on how they will coordinate CSBG funding with other public and private resources including local faith-based organizations. In general, Missouri eligible entities have many more informal partnerships than formal. Table 2. identifies a sample of some of the many partnerships identified by Missouri eligible entities:

Table 2.

| Private Sector | Public Sector | Faith Based Organization |
|---|---|---|
| Chamber of Commerce | School Districts | El Puente's |
| Kerry Myers Insurance Co. | Missouri Department of Corrections | EnterLight Ministries |
| Citizens Bank and Trust | Missouri Department of Public Safety | Catholic Charities |
| New Hampton Hardware | State Universities | Lutheran Family Services |
| Citizen's Electric | University of Missouri Extension | Ministerial Alliance |
| Local Housing Developers | Technical Schools | Samaritan Center |
| US Bank | Elks Lodges | Salvation Army |
| Physicians | Rotary Clubs | St. Vincent De Paul |
| AmerenUE | Lions Clubs | Ladies of Charity |
| Enterprise Leasing | American Red Cross | Cardinal Ritter Institute |
| Monsanto | Experienced Worker Program | Agape Ministries |
| Wal-Mart | Legal Services of Eastern Missouri | Interfaith Ministry |
| Scholastic | Consumer Credit Counseling | Poplar Baptist Church of Ionia |
| Bank of America | Housing Trust Fund | United Methodist Church |
| Marion County Mutual | KCMO Police Department | Presbyterian Church |
| Lewis County Industrial Dev. | Internal Revenue Service | Church of Nazarene |
| Hardee's | Senior Citizen Center | |
| Hawthorne Family Center | Community Services League | |

### (f) Innovative Community and Neighborhood-based Initiatives

Missouri's FFY2008 and FFY2009 CSBG Program Plan (Appendix H) describes the program design used as the foundation for all Missouri CSBG activities. Missouri's program design combines the requirements of the CSBG Act and Missouri Law.

The CSBG Act identifies six conditions of poverty that must be addressed by the program:

- Unemployment,
- Inadequate education and illiteracy,
- Inadequate housing,
- Inadequate available income,
- Unmet emergencies, and
- Malnutrition.

In addition, as the CSBG Recovery Act Funds emphasize a focus on employment-related services and activities that create and sustain economic growth, all activities will be connected to the Working Families Interrelatedness of Needs Framework and/or the Community Capitals Framework.

The CSBG Act identifies the use of nine strategies that may be implemented:

- Strengthen community capabilities for planning and coordinating the use of a broad range of resources: federal, state and local, including private resources.
- Increase the use of innovative and effective community-based approaches.
- Maximize participation of residents of low-income communities and groups served, and empower them to respond to community problems and needs.
- Broaden the resource base of programs directed to the elimination of poverty; secure a more active role for citizens, organizations, and groups.
- Achieve greater participation in the affairs of the community, especially through grassroots partnerships with public and private partners.
- Make more effective use of and coordinate with other related programs.
- Coordinate and establish linkages between governmental and other social service programs.
- Provide a range of services and activities, especially youth development programs.
- Provide emergency direct service.

To be successful, each strategy must address at least one of the causes of a poverty condition. The causes of poverty, however, are both complex and interwoven. Therefore, in most cases, any single strategy needs to be teamed with others to have a measurable impact.

A Missouri Community Action program is a community-based and operated program which includes an intake, assessment, referral and follow-up capability in each of its counties. Community Action programs are designed to include a number of projects or components to provide a range of services and activities having a measurable and potentially major impact on causes of poverty in the community.

Using this program design strategy as the foundation for the Community Action Plan, each eligible entity must submit a description of CSBG Recovery Act programs planned for the agency's geographic area. The description must identify:

- Specific local poverty conditions and causes.
- Working Families Interrelatedness of Needs Framework and/or the Community Capitals Framework.
- Project implementation plans.

- Project's respective national goal and, national direct outcome measure. Each goal/measure will be consistent with Results Oriented Management and Accountability (ROMA) guidelines for CSBG programs.
- A service delivery earnings plan.

Missouri eligible entities have been trained by the state in outcome based management and planning. Each entity regularly assesses the needs of their community and develops local responses to the needs of families and communities. The State has in place, a system to review each entity's proposed initiatives to assure that initiatives are relevant, innovative and will have maximum impact on the problems identified during the planning process.

**(2) Community Needs Assessments:**

**Assurance '676(b)(11) The State will secure from each eligible entity in the State, as a condition to receipt of funding by the entity, 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.**

**Implementation of Assurance '676(b)(11)**

Missouri complies with the assurance in Section '676(b)(11) of the CSBG Act by contracting with an eligible entity only after a Community Action Plan (including a Community Needs Assessment for the community served) has been received from the entity, reviewed and accepted by the CSBG Unit. All 19 eligible entities submitted Community Needs Assessments as part of their FFY08 and FFY09 Action Plans.

FSD intends to extend all agencies' CSBG contracts for FFY10 as the Division and the eligible entities are in a transition period to move to a three year Community Action Plan process referred to as Higher Ground. The purpose of Higher Ground is about creating a new direction and making progress together to fulfill the promise of Community Action and each agency's mission to make positive social change. Higher Ground has been designed by the Community Action Network to improve assessment, planning, implementing and reporting.

Missouri eligible entities conduct intensive long-range strategic planning. As part of these planning processes, eligible entities develop comprehensive data packages for review by staff and board members. In addition, community forums are held to determine what problems local community members think Community Action Agencies should be addressing. This information becomes part of each

eligible entities' Community Needs Assessment and is used to develop the agency's Community Action Plan.

In April 2009 FSD in partnership with the Missouri Community Action Network held a convening to provide training on Community Needs Assessment and unveil a new Comprehensive Community Needs Assessment Web Based Tool. The web based tool was developed by the Center for Applied Research and Environment Systems (CARES), University of Missouri and provides access to over 50 statistical data tables from data sets that include the U.S. Census Bureau, Missouri Departments of Social Services, Health and Senior Services, Education, U.S. Department of Labor and many other sources.

Currently, agencies are completing intensive planning efforts and will be submitting a Comprehensive Family, Community, and Agency Assessment Report to the FSD by July 31, 2009. FSD staff will be reviewing the assessments, providing comment and certifying that agencies have met the criteria and can move to the next phase, planning, and begin developing an agency strategic plan for FFY11, 12 and 13. It is expected agencies will also use the assessment information as they analyze and prioritize current issues and make decisions about CSBG Recovery Act funding.

## E. Fiscal Controls and Monitoring

### (1) State Program Monitoring

(a) The CSBG Unit will at a minimum conduct an onsite review of each eligible entity at least once during a three year period. The review will address prior review findings, governance, finance, ROMA implementation, audit reports, eligible entity status, planning process, and reported performance. The reviews will be conducted from a holistic and systems approach.

FSD monitoring protocols are based on material found in the Standard Monitoring Principles and Practices for CSBG document issued by the National Association of State Community Services Programs (NASCSP). This document identifies guiding principles and practices for monitoring that form the foundation for the FSD's work with eligible entities. Missouri's monitoring protocol and tools address the following areas:

- Planning: Mission, Strategic Planning
- Financial Management: Stability, Records, Practices, Reporting, Oversight, Audit
- Governance: Composition, Training, Meetings, Minutes, Operations, Bylaws, Self-Assessment, Executive Director Relations, Staff Relations

- Customer Service: Confidentiality, Access, Intake, Multi-culturalism, ADA, Client Satisfaction
- Personnel: Organizational Structure, Communication, Supervision, Employee Evaluation, Staff Development, Policies, Procedures and Practices
- ROMA: Outcomes, Training
- Legal Actions: Status, Prevention
- Services and Activities (CSBG and LIHEAP)
- Community: Partnerships, Volunteers,
- Compliance: Agency-Wide, Program

Following the onsite review, a report shall be sent to the agency's Executive Director and Board chairperson. Entities may be asked to prepare a response to the monitoring review letter. If there are significant findings, a follow-up review may be conducted to confirm corrective action steps have been taken.

FSD has established a partnership with the Community Action Association and will make CSBG discretionary funds available through MACA to agencies that may need training or technical assistance to correct weaknesses or deficiencies identified by the FSD or other major funders such as Head Start.

(b) In the event of a newly designated eligible entity, the FSD would conduct an onsite review after the completion of the new entity's first year of CSBG funding.

(c) Prompt follow-up reviews are made onsite at the discretion of the CSBG Unit to address pending matters in any of the subject matters reviewed. An onsite review is not made in instances where paper documentation is possible and reasonably can be mailed to the CSBG Unit.

(d) Various reviews, including peer reviews, are conducted when programs supported by other funding sources are terminated for cause.

(e) Missouri eligible entities are required to submit to the FSD within six months after the end of their fiscal year an independent audit. The most recent independent audit of each eligible entity is for the respective fiscal year end (FYE) indicated in Table 3.

Table 3.

| Eligible Entity A-133 Independent Audits | Time Period Covered | Date Completed |
|---|---|---|
| Central Missouri Community Action | 10/1/06-9/30/07 | 2/27/08 |
| Community Action Agency of St. Louis County | 10/1/06-9/30/07 | 6/26/08 |
| Community Action Partnership of Greater St. Joseph | 3/1/07-2/28/08 | 6/16/08 |
| Community Services Inc. of Northwest Missouri | 1/1/07-12/31/07 | 6/11/08 |
| Delta Area Economic Opportunity Corporation | 1/1/07-12/31/07 | 5/22/08 |
| East Missouri Action Agency | 10/1/07-9/30/08 | 2/9/09 |
| Economic Security Corporation of Southwest Area | 10/1/07-9/30/08 | 2/9/09 |
| Green Hills Community Action Agency | 10/1/07-9/30/08 | 1/23/09 |
| Human Development Corp. of Metropolitan St. Louis | 10/1/06-9/30/07 | 4/13/09 |
| Jefferson-Franklin Community Action Corporation | 3/1/07-2/28/08 | 6/16/09 |
| Missouri Ozarks Community Action Incorporated | 2/1/07-1/31/08 | 5/22/09 |
| Missouri Valley Community Action Agency | 9/1/07-8/31/08 | 2/20/09 |
| North East Community Action Corporation | 10/1/07-9/30/08 | 1/23/09 |
| Northeast Missouri Community Action Agency | 10/1/06-9/30/07 | 1/22/09 |
| Ozark Action, Incorporated | 5/1/07-6/30/08 | 8/29/08 |
| Ozarks Area Community Action Corporation | 10/1/06-9/30/07 | 4/29/09 |
| South Central Missouri Community Action Agency | 10/1/07-9/30/08 | 1/8/09 |
| United Services Community Action Agency | 10/1/07-9/30/08 | 12/29/08 |
| West Central Missouri Community Action Agency | 7/1/07-8/31/08 | 12/31/08 |

FSD uses a variety of activities including visits onsite to the eligible entity, contract review meetings between eligible entity staff and FSD staff at the CSBG office and desk monitoring to review performance and fulfill monitoring requirements. Table 4 outlines the planned onsite and contractual schedule.

Table 4.

| Eligible Entity | Contract Reviews | FFY09 Onsite Reviews | Contract Reviews | FFY10 Onsite Reviews |
|---|---|---|---|---|
| Central Missouri Community Action | 9/10/2007 | X■ | 8-9/10 | |
| Community Action Agency of St. Louis County | 8/24/2007 | X■ | 8-9/10 | |
| Community Action Partnership of Greater St. Joseph | 9/07/2007 | X■ | 8-9/10 | |
| Community Services Inc. of Northwest Missouri | 8/15/2007 | | 8-9/10 | X■ |
| Delta Area Economic Opportunity Corporation | 8/16/2007 | | 8-9/10 | X |
| East Missouri Action Agency | 8/15/2007 | | 8-9/10 | X |
| Economic Security Corporation of Southwest Area | 8/27/2007 | | 8-9/10 | X■ |
| Green Hills Community Action Agency | 9/05/2007 | X* | 8-9/10 | |
| Human Development Corp. of Metropolitan St. Louis | 9/06/2007 | X● | 8-9/10 | |
| Jefferson-Franklin Community Action Corporation | 8/29/2007 | | 8-9/10 | X■ |
| Missouri Ozarks Community Action Incorporated | 8/17/2007 | X● | 8-9/10 | |
| Missouri Valley Community Action Agency | 9/07/2007 | | 8-9/10 | X |
| North East Community Action Corporation | 8/17/2007 | X■ | 8-9/10 | |
| Northeast Missouri Community Action Agency | 9/10/2007 | X■ | 8-9/10 | |
| Ozark Action, Incorporated | 8/27/2007 | X■ | 8-9/10 | |
| Ozarks Area Community Action Corporation | 8/21/2007 | X■ | 8-9/10 | |
| South Central Missouri Community Action Agency | 8/29/2007 | | 8-9/10 | X■ |
| United Services Community Action Agency | 8/28/2007 | X■ | 8-9/10 | |
| West Central Missouri Community Action Agency | 9/05/2007 | X■ | 8-9/10 | |

*FFY2008 ● FFY2008 and FFY2009 ■ FFY2009

**(2) Corrective Action, Termination and Reduction of Funding**

The State's plan for complying with the requirements of Section 678C of the Act are included in paragraph 35 of the service contract with each eligible entity. That portion of the contract document is provided as Appendix I.

**(3) Tracking**

Requirements for separately tracking expenditure of funds made available by the Recovery Act and in accordance with Section 1512 (c) of the American Recovery Act will be met through the Statewide Accounting for Missouri (SAM II) control system and through requirements of contracts with eligible entities and other providers. FSD plans to execute separate CSBG contracts and CSBG Recovery Act contracts. The State of Missouri has established separate appropriation authority; and program codes will also be used in SAM II for tracking.

Governor Jeremiah W. (Jay) Nixon established the Transform Missouri Initiative to administer the Recovery Act and maximize the benefit of the funds to create jobs for Missourians and move the economy forward. Toward this end, two Transform Missouri Initiative (TMI) teams, the Transform Missouri Implementation Team (TM-I) and the Transform Missouri Transparency Team (TM-T) have been formed. These teams will be working with each State Department to meet all tracking and reporting requirements as information becomes available from the Federal government.

FSD plans to pass on the appropriate separate reporting and tracking requirements to eligible entities as part of CSBG Recovery Act contracts. As additional information becomes available, FSD will supplement initial guidance and requirements provided to eligible entities.

In October 2006 Missouri implemented a state wide web-based Management Information System (MIS) that is phasing in the collection and reporting of client demographic information as well as outcomes. To the extent possible the MIS will be used to assist with tracking services and outcomes.

## F. Reporting and Registration Requirements

### (1) Recovery Act Reporting and Registration

(a) Reporting will utilize the tracking systems and resources of the State and eligible entities outlined above.

Before the FSD will fully execute a CSBG contract, contractors must specifically link performance and results through the Results Oriented Management and Accountability (ROMA) national goals and outcome measures. All 19 Missouri eligible entities and discretionary fund recipients are required to report outcomes.

Because eligible entities deliver local programs to address local needs, Missouri allows eligible entities to identify their own specific outcomes and measures. All outcomes and measures must be connected to one of the six national ROMA goals

FSD plans to develop reporting frames using ROMA and the conceptual frameworks identified earlier in this plan to demonstrate results that have been achieved that advance individuals and prepare communities for sustainable growth and development. Reporting will recognize more than just job creation.

(b) FSD will collect the required information from the eligible entities and report to HHS no later than ten calendar days after each calendar quarter in which Recovery Act funds have been received.

(c) FSD will comply with registration requirements for Central Contractor Registration. A Dun and Bradstreet Data Universal Numbering System (DUNS) Number will be maintained.

(d) FSD will comply with reporting requirements described in section 1512 (c) of the Recovery Act.

Appendix A

Letter of Transmittal
(To Be Inserted)

Appendix B.

Designation of Lead State Agency to Administer the CSBG Program
(To Be Inserted)

Appendix C.1.

Documentation of Public Inspection
(To Be Determined)

C.2.

Documentation of Public Comments
(To Be Determined)

# Community Services Block Grant Assurances.

*Community Services Block Grant Reauthorization Act of 1998: P.L. 105-285*

As a part of the annual or biannual application and plan required by subsection 676 of Community Services Block Gant Act, as amended, (412 U.S. C.9901 et seq.) (The Act), the designee of the Chief Executive of **the State hereby agrees to the Assurances in Section 676 of the Act** -

## Programmatic Assurances

(1) an assurance that funds made available through the grant or allotment will be used—

(A) to support activities that are designed to assist low-income families and individuals, including families and individuals receiving assistance under part A of title IV of the Social Security Act (42 U.S.C. 601 et seq.), homeless families and individuals, migrant or seasonal farm workers, and elderly low-income individuals and families, and a description of how such activities will enable the families and individuals—

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

(ii) to secure and retain meaningful employment;

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

(iv) to make better use of available income;

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

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

(vii) to achieve greater participation in the affairs of the communities involved, including the development of public and private grassroots partnerships with local law enforcement 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;

(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; and

(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);

(2) a description of 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;

(3) information provided by eligible entities in the State, containing—

(A) a description of the service delivery system, for services provided or coordinated with funds made available through grants made under section 675C(a), targeted to low-income individuals and families in communities within the State;

(B) a description of how linkages will be developed to fill identified gaps in the services, through the provision of information, referrals, case management, and follow-up consultations;

(C) a description of how funds made available through grants made under section 675C(a) will be coordinated with other public and private resources; and

(D) a description of how the local entity will use the funds 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 effective parenting;

(4) an assurance 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;

(5) an assurance that the State and the eligible entities in the State will coordinate, and establish linkages between, governmental and other social services programs to assure the effective delivery of such services to low-income individuals and to avoid duplication of such services, and a description of how the State and the eligible entities will coordinate the provision of employment and training activities, as defined in section 101 of such Act, in the State and in communities with entities providing activities through statewide and local workforce investment systems under the Workforce Investment Act of 1998;

(6) 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;

(7) an assurance that the State will permit and cooperate with Federal investigations undertaken in accordance with section 678D;

(8) 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);

(9) an assurance 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;

(10) an assurance that 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;

(11) 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**;**

(12) 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 a description of outcome measures to be used to measure eligible entity performance in promoting self-sufficiency, family stability, and community revitalization; and

(13) information describing how the State will carry out the assurances[676(b)(13)] (**This is the Narrative CSBG State Plan**).

## Administrative Assurances

The State further agrees to the following administrative assurances, as required under the Community Services Block Grant Act:

(1) **STATE APPLICATION AND PLAN**- To submit an application to the Secretary containing information and provisions that describe the programs for which assistance is sought under the Community Services Block Grant program prepared in accordance with and containing the information described in Section 676 of the Act. ['675A(b)] –

(2) To use not less than 90 percent of the funds made available to the State by the Secretary under Section 675A or 675B of the Act to make grants to eligible entities for the stated purposes of the Community Services Block Grant program and to make such funds available to eligible entities for obligation during the fiscal year and the succeeding fiscal year, subject to the provisions regarding recapture and redistribution of unobligated funds outlined below. ['675C(a)(1) and (2)]

(3) In the event that the State elects to recapture and redistribute funds to an eligible entity through a grant made under Section 675C(a)(1) when unobligated funds exceed 20 percent of the amount so distributed to such eligible entity for such fiscal year, the State agrees to redistribute recaptured funds to an eligible entity, or require the original recipient of the funds to redistribute the funds to a private, nonprofit organization, located within the community served by the original recipient of the funds, for activities consistent with the purposes of the Community Services Block Grant program. ['675C (a)(3)]

(4) To spend no more than the greater of $55,000 or 5 percent of its grant received under Section 675A or the State allotment received under section 675B for administrative expenses, including monitoring activities. ['675C(b)(2)]

(5) In states with a charity tax credit in effect under state law, the State agrees to comply with the requirements and limitations specified in Section 675© regarding use of funds for statewide activities to provide charity tax credits to qualified charities whose predominant activity is the provision of direct services within the United States to individuals and families whose annual incomes generally do not exceed 185 percent of the poverty line in order to prevent or alleviate poverty among such individuals and families. ['675(c)]

(6) That the lead agency will hold at least one hearing in the State with sufficient time and statewide distribution of notice of such hearing, to provide to the public an opportunity to comment on the proposed use and distribution of funds to be provided through the grant or allotment under Section 675A or '675B for the period covered by the State Plan. ['676(a)(2)(B)]

(7) That the chief executive officer of the State will designate, an appropriate State agency for purposes of carrying out State Community Services Block Grant program activities. ['676(a)(1)]

(8) To hold as least one legislative hearing every three years in conjunction with the development of the State Plan.['676(a)(3)]

(9) To make available for the public inspection each plan or revised State Plan in such a manner as will facilitate review of and comment on the plan. ['676(e)(2)]

(10) To conduct the following reviews of eligible entities:

a. a. a full onsite review of each such entity at least once during each three-year period;
b. an onsite review of each newly designated entity immediately after the completion of the first year in which such entity receives funds through the Community Services Block Grant program;]
c. follow-up reviews including prompt return visits to eligible entities, and their programs, that fail to meet the goals, standards, and requirements established by the State;
d. other reviews as appropriate, including reviews of entities with programs that have had other Federal, State or local grants (other than assistance provided under the Community Services Block Grant program) terminated for cause. ['678B(a)]

(11) In the event that the State determines that an eligible entity fails to comply with the terms of an agreement or the State Plan, to provide services under the Community Services Block Grant program or to meet appropriate standards, goals, and other requirements established by the State (including performance objectives), the State will comply with the requirements outlined in Section 678C of the Act, to:

a. Inform the entity of the deficiency to be corrected
b. require the entity to correct the deficiency
c. offer training and technical assistance as appropriate to help correct the deficiency, and submit to the Secretary a report describing the training and technical assistance offered or stating the reasons for determining that training and technical assistance are not appropriate;
d. at the discretion of the State, offer the eligible entity an opportunity to develop and implement, within 60 days after being informed of the deficiency, a quality improvement plan and to either approve the proposed plan or specify reasons why the proposed plan cannot be approved;
e. after providing adequate notice and an opportunity for a hearing, initiate proceedings to terminate the designation of or reduce the funding to the eligible entity unless the entity corrects the deficiency. ['678(c)(a)]

(12) To establish fiscal controls, procedures, audits and inspections, as required under Sections 678D(a)(1) and 678D(a)(2) of the Act.

(13) To repay to the United States amounts found not to have been expended in accordance with the Act, or the Secretary may offset such amounts against any other amount to which the State is or may become entitled under the Community Services Block Grant program. [678D(a)(3)]

(14) To participate, by October 1, 2001, and ensure that all-eligible entities in the State participate in the Results-Oriented Management and Accountability (ROMA) System ['678E(a)(1)].

(15) To prepare and submit to the Secretary an annual report on the measured performance of the State and its eligible entities, as described under 678E(a)(2) of the Act.

(16) To comply with the prohibition against use of Community Services Block Grant funds for the purchase or improvement of land, or the purchase, construction, or permanent improvement (other than low-cost residential weatherization or other energy-related home repairs) of any building or other facility, as described in Section 678F(a) of the Act.

(17) To ensure that programs assisted by Community Services Block Grant funds shall not be carried out in a manner involving the use of program funds, the provision of services, or the employment or assignment of personnel in a manner supporting or resulting in the identification of such programs with any partisan or nonpartisan political activity or any political activity associated with a candidate, or contending faction or group, in an election for public or party office; any activity to provide voters or prospective voters with transportation to the polls or similar assistance with any such election, or any voter registration activity. ['678F(b)]

(18) To ensure that no person shall, on the basis of race, color, national origin or sex be excluded from participation in, be denied the benefits of, or be subjected to discrimination under, any program or activity funded in whole or in part with Community program funds. Any prohibition against discrimination on the basis of age under the Age Discrimination Act of 1975 (42 U.S.C. 6101 et seq.) or with respect to an otherwise qualified individual with a disability as provided in Section 504 of the Rehabilitation Act of 19734 (29 U.S.C. 12131 et seq.) shall also apply to any such program or activity. ['678FC]

(19) To consider religious organizations on the same basis as other non-governmental organizations to provide assistance under the program so long as the program is implemented in a manner consistent with the Establishment Clause of the first amendment to the Constitution; not to discriminate against an organization that provides assistance under, or applies to provide assistance under the Community Services Block Grant program on the basis that the organization has a religious character; and not to require a religious organization

to alter its form of internal government except as provided under Section 678B or to remove religious art, icons, scripture or other symbols in order to provide assistance under the Community Services Block Grant program. ['679]

## Other Administrative Certifications

The State also certifies the following

(1) To provide assurances that cost and accounting standards of the Office of Management and Budget (OMB Circular A-110 and A-122) shall apply to a recipient of Community Services Block Grant program funds

(2) To comply with the requirements of Public Law 103-227, Part C Environmental Tobacco Smoke, also known as the Pro-Children Act of 1994, which requires that smoking not be permitted in any portion of any indoor facility owned or leased or contracted for by an entity and used routinely or regularly for the provision of health, day care, education, or library services to children under the age of 18 if the services are funded by a Federal grant, contract, loan or loan guarantee.. The State further agrees that it will require the language of this certification be included in any sub-awards, which contain provisions for children's services and that all subgrantees shall certify accordingly

_____ _____

Administrator/Director of Designated Lead Agency Signature | Date

## Additional Statement of Federal and CSBG Recovery Act Assurances

The State further agrees to the following, as required under the Recovery Act:

(1) To submit a plan to the Secretary containing information and provisions that describe the programs for which assistance is sought under the Community Services Block Grant program prepared in accordance with and containing the information described in the Recovery Act.

(2) To distribute not less than 99 percent of the Recovery Act allocations made available to the State by the Secretary to make grants to "eligible entities" as defined by Section 673(1) of the CSBG Act for the stated purposes of the Recovery Act.

(3) To make such funds available to eligible entities for obligation during the fiscal year and the succeeding fiscal year, subject to the provisions regarding carryover of unobligated funds as stated in the Appropriations Act. (H.R. 3061)

(4) To spend no more than 1 percent of the State allotment received under the Recovery Act for benefits enrollment coordination activities relating to the identification and enrollment of eligible individuals and families in Federal, State, and local benefit programs.

(5) To fulfill supplemental reporting requirements for CSBG Recovery Act funds.

(6) To provide information describing how the State will carry out activities and services supported by Recovery Act funds. **(This is the Narrative State CSBG Recovery Act Plan)**

_____ _____

Administrator/Director of Designated Lead Agency Signature — Date

**Appendix F**

# STATE OF MISSOURI COMMUNITY ACTION AGENCIES

**CENTRAL MISSOURI COMMUNITY ACTION**
Darin Preis, CCAP,
Executive Director
807B N. Providence Rd.
Columbia, MO 65203

**COMMUNITY ACTION AGENCY OF ST. LOUIS COUNTY, INC**.
Merline Anderson,
Executive Director
2709 Woodson Road
Overland, MO 63114

**COMMUNITY ACTION PARTNERSHIP OF GREATER ST. JOSEPH**
Dave Leyland, CCAP,
Executive Director
817 Monterey Street
P O Box 3068
St. Joseph, MO 64503-3068

**COMMUNITY SERVICES, INC. OF NORTHWEST MISSOURI**
David Bell, CCAP,
Executive Director
1212 B South Main
P O Box 328
Maryville, MO 64468-0328

**DELTA AREA ECONOMIC OPPORTUNITY CORPORATION**
Jean Barham, Executive Director
99 Skyview Road
Portageville, MO 63873-1616

**EAST MISSOURI ACTION AGENCY**
Bill Bunch, CCAP,
Executive Director
403 Parkway Drive
P O Box 308
Park Hills, MO 63601

**ECONOMIC SECURITY CORPORATION OF SOUTHWEST AREA**
John Joines, CCAP,
Chief Executive Officer
302 S. Joplin Street
P O Box 207
Joplin, MO 64802-0207

**GREEN HILLS COMMUNITY ACTION AGENCY**
Scott Long,
Executive Director
1506 Oklahoma Avenue
P O Box 278
Trenton, MO 64683-0278

**HUMAN DEVELOPMENT CORP. OF METROPOLITAN ST. LOUIS**
Ruth Smith,
President & CEO
929 North Spring Avenue
St. Louis, MO 63108-3681

**JEFFERSON-FRANKLIN COMMUNITY ACTION CORPORATION**
Ellen Dietrich,
Executive Director
#2 Merchant Drive
P O Box 920
Hillsboro, MO 63050

**MISSOURI OZARKS COMMUNITY ACTION AGENCY**
Dave Miller, CCAP,
Executive Director
306 S. Pine Street
P O Box 69
Richland, MO 65556

**MISSOURI VALLEY COMMUNITY ACTION AGENCY**
Pam LaFrenz, CCAP,
Executive Director
1415 South Odell
Marshall, MO 65340-3144

**NORTHEAST COMMUNITY ACTION CORPORATION**
Donald Patrick, President & CEO
16 North Court Street
P O Box 470
Bowling Green, MO 63334-0470

**NORTHEAST MISSOURI COMMUINITY ACTION AGENCY**
Penny Miles, CCAP,
Executive Director
1011 S. Jamison Street
P O Box 966
Kirksville, MO 63501-0966

**OZARK ACTION, INC.**
Bryan Adcock, Executive Director
710 East Main St.
West Plains, MO 65775-0588

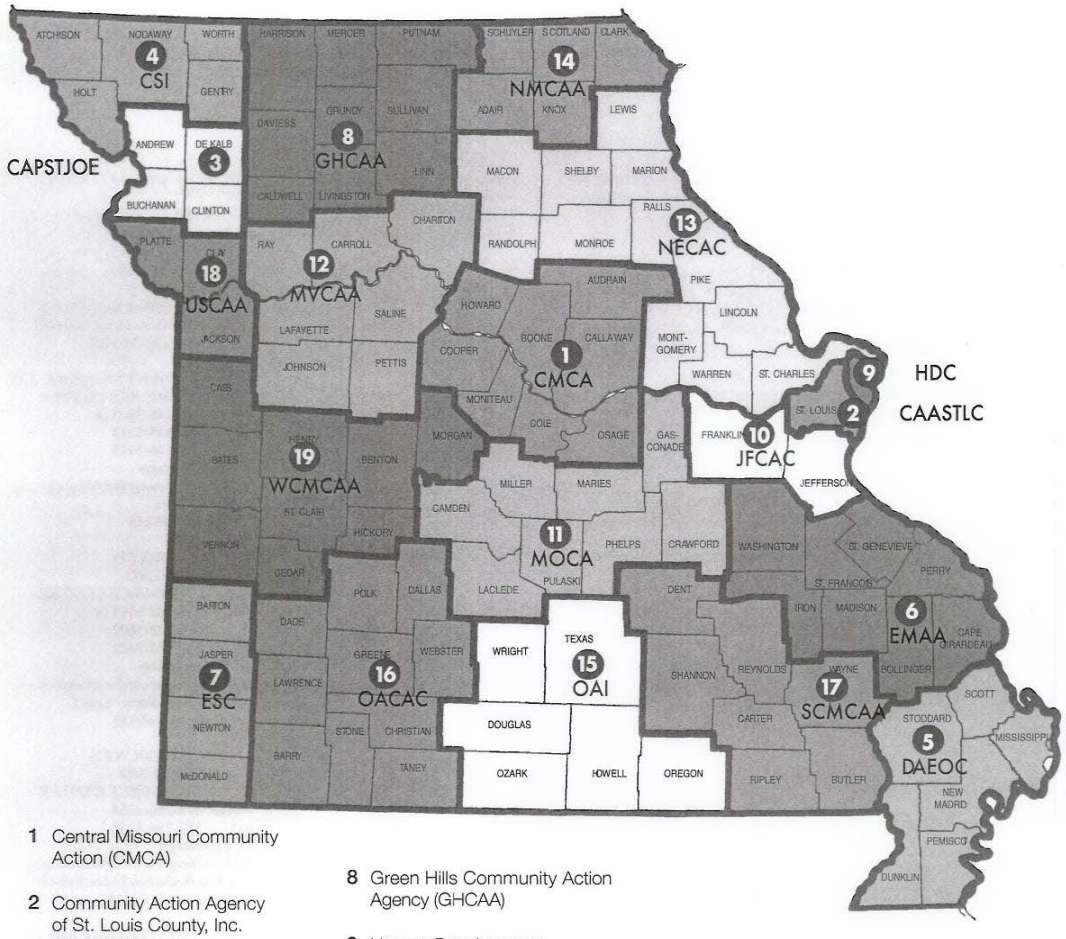
**OZARKS AREA COMMUNITY ACTION CORPORATION**
Carl Rosenkranz,
Executive Director
215 S. Barnes
Springfield, MO 65802

**SOUTH CENTRAL MISSOURI COMMUNITY ACTION AGENCY**
William Davis,
Executive Director
Old Alton Road
P O Box 6
Winona, MO 65588

**UNITED SERVICES COMMUNITY ACTION AGENCY**
Tommie Barnett,
Executive Director
6323 Manchester Avenue
Kansas City, MO 64133

**WEST CENTRAL MISSOURI COMMUNITY ACTION AGENCY**
Amos Jackson, President & CEO
106 West 4th Street
P O Box 125
Appleton City, MO 64724

# State of Missouri Community Action Agencies




1 Central Missouri Community Action (CMCA)

2 Community Action Agency of St. Louis County, Inc. (CAASTLC)

3 Community Action Partnership of Greater St. Joseph (CAPSTJOE)

4 Community Services, Inc. of Northwest Missouri (CSI)

5 Delta Area Economic Opportunity Corporation (DAEOC)

6 East Missouri Action Agency (EMAA)

7 Economic Security Corporation of Southwest Area (ESC)

8 Green Hills Community Action Agency (GHCAA)

9 Human Development Corporation of Metropolitan St. Louis (HDC)

10 Jefferson-Franklin Community Action Corporation (JFCAC)

11 Missouri Ozarks Community Action, Inc. (MOCA)

12 Missouri Valley Community Action Agency (MVCAA)

13 North East Community Action Corporation (NECAC)

14 Northeast Missouri Community Action Agency (NMCAA)

15 Ozark Action, Inc. (OAI)

16 Ozarks Area Community Action Corporation (OACAC)

17 South Central Missouri Community Action Agency (SCMCAA)

18 United Services Community Action Agency (USCAA)

19 West Central Missouri Community Action Agency (WCMCAA)

Appendix H

MISSOURI FFY2008-2009 CSBG PROGRAM PLAN

I. PROGRAM NEED

The Annual Social and Economic Supplement (ASEC) to the Current Population Survey (CPS) for 2005, identified 659,000 (11.6%) Missourians with income at or below the poverty line (i.e., $10,160 for one person under 65 years, $15,735 for a family unit with one adult and two children). A total of 243,000 Missourians in poverty were children under 18 years of age and 61,000 were 65 years of age or older. From another perspective, there were 151,000 families at or below the poverty level.

According to the 2005 CPS ASEC the number of Missourians with income just slightly above the poverty line (125%) was 258,000, making the number of Missourians living below the poverty line or just slightly above, more than the combined population of Missouri's two most populated cities, Kansas City and St. Louis (778,695).

Poverty is complex and the risk of over simplifying the subject is high when the number of individuals living under the official poverty level is the only source of information presented. In 2007 The Missouri Women's Council published the Missouri Family Affirming Wages study which attempts to quantify the wages needed to meet a Missouri family's basic needs. The Missouri Family Affirming Wage identifies basic family expenses (housing, childcare, food, transportation, health care, telephone, taxes and miscellaneous) for different family types for each county in the state and the wages the family would need to earn to cover those expenses. The study takes into account how costs can vary with different ages of children, regional variation in basic expenses, sales, state and federal taxes, and, last, the study considers the differences in the costs a family

incurs with or without employer-sponsored health insurance. The tables below show the Family Affirming Wages for 3 different counties in Missouri:

**Missouri Family Wages for Jackson**

| | *Adult* | *Adult + Preschool* | *2 Adults + Preschool + School age* |
|---|---|---|---|
| *Housing* | $561 | $652 | $652 |
| *Childcare* | $0 | $517 | $856 |
| *Food* | $212 | $295 | $610 |
| *Transportation* | $213 | $213 | $427 |
| *Health Care* | $66 | $227 | $263 |
| *Miscellaneous* | $108 | $193 | $284 |
| *Telephone* | $28 | $28 | $28 |
| *Sales Tax* | $9 | $16 | $24 |
| *Other Taxes* | $108 | $193 | $283 |
| *Missouri Family Wage with Employer Health Care* | | | |
| *Annual* | $15,660 | $28,026 | $41,108 |
| *Missouri Family Wage without Employer Health Care* | | | |
| *Annual* | $18,131 | $31,589 | $50,996 |

**Missouri Family Wages for Greene**

| | *Adult* | *Adult + Preschool* | *2 Adults + Preschool + School age* |
|---|---|---|---|
| *Housing* | $405 | $520 | $520 |
| *Childcare* | $0 | $433 | $718 |
| *Food* | $212 | $295 | $610 |
| *Transportation* | $196 | $196 | $392 |
| *Health Care* | $66 | $227 | $263 |
| *Miscellaneous* | $91 | $170 | $253 |
| *Telephone* | $28 | $28 | $28 |
| *Sales Tax* | $7 | $13 | $19 |
| *Other Taxes* | $90 | $169 | $252 |
| *Missouri Family Wage with Employer Health Care* | | | |
| *Annual* | $13,134 | $24,621 | $36,670 |
| *Missouri Family Wage without Employer Health Care* | | | |
| *Annual* | $15,603 | $28,181 | $46,550 |

**Missouri Family Wages for New Madrid**

| | *Adult* | *Adult + Preschool* | *2 Adults + Preschool + School age* |
|---|---|---|---|
| *Housing* | $338 | $413 | $413 |
| *Childcare* | $0 | $336 | $559 |
| *Food* | $212 | $295 | $610 |
| *Transportation* | $190 | $190 | $379 |
| *Health Care* | $66 | $227 | $263 |
| *Miscellaneous* | $83 | $149 | $225 |
| *Telephone* | $28 | $28 | $28 |
| *Sales Tax* | $6 | $11 | $17 |
| *Other Taxes* | $83 | $148 | $225 |
| *Missouri Family Wage with Employer Health Care* | | | |
| *Annual* | $12,071 | $21,568 | $32,630 |
| *Missouri Family Wage without Employer Health Care* | | | |
| *Annual* | $14,540 | $25,128 | $42,510 |

(Miscellaneous includes essentials such as clothing, non-prescription medicine, school supplies and cleaning supplies. It does not allow for recreation, entertainment or savings.)

The federal government statistical measure of poverty, a national standard established in 1963 and updated annually, is based on the annual income needed for a family to survive using a formula derived from families' financial burden in the late fifties and early sixties. The 2007 poverty line for a family of one is $10, 210, for a family of two $13,690 and for a family of four $20,650. The poverty thresholds are set at the same level all across the country. A comparison of the poverty thresholds and the Family Affirming wages indicates significant differences. For example, the gap for a two person family (adult and preschooler) in Jackson County is $14,336 ($28,026 Family Affirming Wage - $13,690 poverty threshold for family of two) with employer health care or $17,899 ($31,589 Family Affirming Wage - $13,690 poverty threshold for family of two) without employer health care. The economic security gap, the span on the economic ladder a family living in the crisis of poverty must climb to be able to meet their basic needs and achieve economic security, can be significant. Families attempting to hold on and climb the economic ladder and the communities they live in need a variety of supports in order to reach their full potential.

## II. PROGRAM DESIGN

The Community Services Block Grant (CSBG) program provides for a local response to the identified need and the conditions of poverty experienced by all Missouri citizens who live in the crisis of poverty. The purposes of the response are for the reduction of poverty, the revitalization of low-income communities, and the empowerment of low-income families and individuals. The Community Services Block

Grant Act was included as part of the Coats Human Services Reauthorization Act of 1998, P. L. 105-285, and continues a successful New Federalism program implemented in 1981. In addition to identifying responsibilities of federal, state and local levels, the legislation both reaffirmed and defined the basic dimensions of the community action programs.

CSBG legislation is directed at removing the obstacles and solving the problems that prevent people from becoming self-sufficient. The goal is to have a measurable and potentially major impact on causes of poverty in the community and may help the families and individuals to achieve self-sufficiency. The CSBG legislation identifies six conditions of poverty that must be addressed by the CSBG program:

- Unemployment
- Inadequate education and illiteracy
- Inadequate housing
- Inadequate available income
- Unmet emergencies
- Malnutrition

The CSBG legislation is also explicit in mandating the use of nine strategies:

- Strengthen community capabilities for planning and coordinating the use of a broad range of resources: federal, state, local, including private resources.
- Increase use of innovative and effective community-based approaches.

- Maximize participation of residents of low-income communities and groups served, and empower them to respond to community problems and needs.
- Broaden the resource base of programs directed to the elimination of poverty; secure a more active role for citizens, organizations, and groups.
- Achieve greater participation in the affairs of the community, especially through grassroots partnerships with law enforcement agencies and others.
- Make more effective use of and coordinate with other related programs.
- Coordinate and establish linkages between governmental and other social service programs.
- Provide a range of services and activities, especially youth development programs.
- Provide emergency direct service.

To be successful, each strategy must address at least one of the causes of a poverty condition. The causes of poverty, however, are both complex and interwoven. Therefore, in most cases, any single strategy needs to be teamed with others to have a measurable impact.

A Missouri community action program is a community based and operated program which includes an intake assessment and referral capability in each of its counties and is designed to include a number of projects or components to provide a range of services and activities having a measurable and potentially major impact on causes of poverty in the community.

Local Providers will be required to implement a mix of the following local initiative strategies to address locally identified causes of each poverty condition identified by federal law:

Community Coordination/Resource Development

Institutional Partnerships

Collaboration Networks

Revitalization Coalitions

Family Development

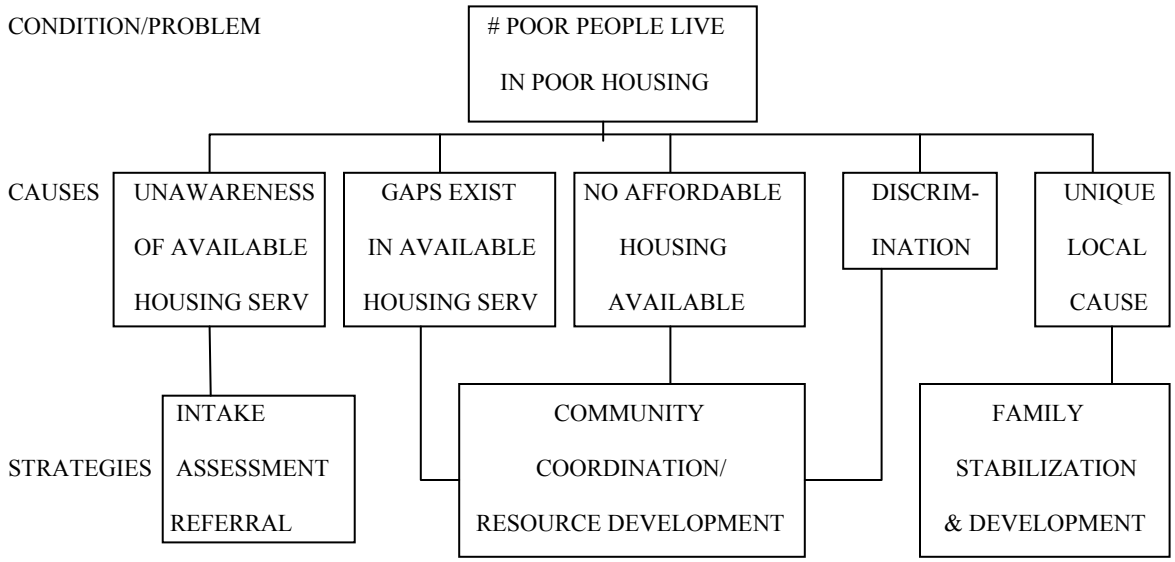
Family Intake/Assessment/Referral

Family Crisis Response

Family Support

Local Supplements

The following diagram is an example of the program design for only one condition:




A specific number of poor people live in poor housing (condition/problem). They live in poor housing because they are unaware of available housing services, because

gaps/overlaps exist in available housing services, because no housing is available which they can afford, because discrimination exists which prevents them from obtaining adequate housing, and/or because of other reasons unique to the local area (causes). Appropriate CSBG mandated strategy initiatives (projects) have been implemented to have an impact on these causes.

## III. LOCAL INITIATIVE PROJECTS

Most poverty causes are unique to respective geographic areas. Local Initiative gives local communities the flexibility to develop strategies that address unique local causes. In this way, CSBG strategies become hometown guides toward self-sufficiency, operated by local people for the benefit of their neighbors. CSBG strategies then can solve community problems, benefit local people, and enhance local economic development.

### Community Coordination/Resource Development Strategies

Community Coordination/Resource Development (CCRD) Strategies focus on six mandated strategies: to strengthen community capabilities for planning, to increase use of innovative and effective community-based approaches, to broaden the resource base of programs and secure a more active role for citizens, to achieve greater participation in the affairs of the community through grassroots partnerships, to make more effective use of and coordinate with other related programs, and to coordinate and establish linkages. There are three identified types of CCRD strategies:

### Institutional Partnerships

Institutional Partnerships are targeted toward a single institution. Focus is on issues of access to services, barrier removal, improved service or product, and design of

new service or product. Function is to advocate for the expansion of institutional scope or mission either by convincing the institution that it does have a role and responsibility in relation to the issues or by supporting measures designed to broaden its mandate.

Collaboration Networks

Collaboration networks are targeted toward gaps and overlaps, role clarification, increase in service capacity/capability among network members, and creating new resources. Focus is on care and maintenance of a network. Function is to create service delivery coordination, develop joint projects to leverage new funding, facilitate information exchange, and participate in network sponsored community needs assessments.

Revitalization Coalitions

Revitalization coalitions are targeted toward raising awareness of the extent of a poverty condition/cause, on the consequences on continued inaction, and on structuring a coalition of stakeholders. Focus is on gaining a place at the table. Function is to obtain the support, endorsement, or participation of entities that can expedite the work of and ensure the success of the coalition's efforts.

Family Development Strategies

Family Development Strategies address family empowerment issues. Family Development Strategies implement mandated strategies to provide a range of services and activities, to maximize participation of residents of low-income communities and groups, and to provide emergency direct service.

Family Intake/Assessment/Referral

Family Intake/Assessment/Referral (IAR) is a process that includes effective outreach encouraging potential clients to seek services both from the outreach agency and other community resources, determination of client eligibility, assessment of client strengths and needs, referral for direct services utilizing an existing public or private community resource, and follow-up to assure completed action. Family IAR provides the critical link between the poor and the existing services they need.

Family Crisis Response

Family Crisis Response addresses families' immediate and urgent condition lacking the lowest Maslow needs: food, shelter, clothing, etc. Family Crisis Response is appropriate to meet urgent family needs, including the need for health services, nutritious food, safe and sanitary housing, and employment-related assistance. In most cases, Family Crisis Response will be teamed with a CCRD project to create more adequate community responses and/or another FD program to achieve longer-term positive family stability.

Family Support

Family Support provides an integrated process which centers around continuous services and rational decision-making in designing and executing an individualized plan of action. A family's plan of action will focus first on controlling a crisis or at-risk condition, then on attaining and maintaining a stable, safe, or thriving condition through a support system designed to strengthen the family.

Local Supplements

Examples of Local Supplements include literacy tutoring, skills training, job development and placement, community participation and responsibility, etc. Local Supplements may be targeted toward vulnerable populations.

## IV. PROGRAM IMPLEMENTATION

State Agency

Governor Matt Blunt has designated the Missouri Department of Social Services to administer the CSBG Program. The Department Director has placed the CSBG Program in the Family Support Division.

Eligible Participants

CSBG projects will serve those individuals whose family unit income falls at or below the official federal Health and Human Services poverty guidelines, particularly families who are attempting to transition off a State program carried out under Title IV, A, of the Social Security Act. In addition, when the board of directors of an eligible entity determines that it serves the objectives of the CSBG program, CSBG strategies may serve individuals whose family unit income does not exceed 125% of the official poverty guideline.

Eligible Providers

CSBG legislation specifies that at least 90% of CSBG funds go to legislatively identified eligible entities whose Board of Directors have a particular composition (at least one-third democratically selected representatives of the poor, one-third elected public officials or their representatives, and the remainder members of private groups and

organizations). In Missouri, private not-for-profit community action agencies are eligible entities.

Community action agencies provide a multi-faceted human service delivery system, capable of administering locally short term and long term human service programs. The mission of community action agencies is to assist economically disadvantaged persons in identifying problems and causes, then to develop a plan to overcome these barriers in order to achieve the highest level of family self-sufficiency. In carrying out this mission, community action agencies contract with a variety of sources to provide a comprehensive local program in every county with the following minimum characteristics:

- Standardized Intake/Assessment/Referral system which includes basic intake and eligibility for services information, engages the client in an individual assessment of the causes of poverty in the family, and refers individuals to appropriate resources to change these causes and gain more control of their lives.
- Management systems which integrate standards from all funding sources into a comprehensive system to plan, organize, direct, and evaluate the total agency operation as well as the component parts.
- Management systems which allow for standardized accountability as well as flexibility in program design and operation to meet local needs. System accountability can be applied or modified to deal with unforeseen situations expediently.

- Tripartite base of community input and support including elected local officials, private sector representatives, and low-income representatives. Coalition occurs of major community groups who know problems and have access to resources.
- Capability to leverage resources.
- Coordination of local resources and linkages among local agencies and governments through basic managerial and operational systems which involve these others in impacting individual and/or community problems.
- Assurance that all persons receive an equal opportunity to participate.
- Capability for testing pilot, innovative approaches through management capacity and grassroots connections with target groups and community resources.
- Capability for dealing with emergency situations.

Contracting Process

A two-year performance based contract will be offered to each community action agency. Each agency must submit information required by the Division and a community action plan, which includes the following:

- Community needs assessment (including food needs);
- Agency strategic plan or agency logic models;
- Listing and documentation of current board of directors;
- Supplemental CSBG Program Schedule disclosures for the last full CSBG program year ending September 30. Unaudited schedules must be submitted if audited schedules are not yet available;

- Description of the service delivery system targeted to low-income individuals and families in the service area;
- Description of how linkages will be developed to fill identified gaps in services through information, referral, case management, and follow up consultations;
- Description of how funding under the Act will be coordinated with other public and private resources;
- Description of outcome measures to be used to monitor success in promoting self-sufficiency, family stability and community revitalization.

Then as part of the community action plan each agency must submit a description of the FFY2008-2009 CSBG program planned for the agency's geographic area. The description must identify:

- Specific local poverty conditions.
- Causes of poverty conditions.
- Projects to be supported with CSBG funding and other agency funds that will be implemented to have an impact on these causes.
- Project implementation plans.
- Project's respective national goal and, based on the provider's current needs assessment, outcome measures, national performance indicators, and target. Each goal/measure will be consistent with federal Health and Human Services Results Oriented Management and Accountability (ROMA) guidelines for CSBG programs.
- A service delivery earnings plan.

Contract Support System

The State's own implementation costs will be minimized so that dollars available for actual strategy implementation will be maximized:

- The State may require all nineteen community action agencies to utilize a common local management information system including an intake form, a contractor maintained participant file, monthly performance reports, and an annual outcome/impact report.
- The State will conduct periodic on-site monitoring visits and will provide CSBG Providers an outline to use in their own on-site monitoring.
- The State will work with the Community Action Network to identify training opportunities that will strengthen eligible entities and keep them focused, effective and accountable. Training opportunities may be provided in the areas of finance, administration and management, governance, program implementation and accountability.

Program Monitoring

The State will insist on program accountability and will conduct on-site monitoring visits to assure compliance with the federal regulations and to assure effective and efficient completion of the activities defined within the scope of the contract. Appropriateness of contractor program progress reports will be determined by independent verification of local documentation provided by the State mandated management information system.

Program Evaluation

Evaluation will measure the impact a CSBG Provider's effort had on the causes of the conditions being addressed. Impact is the effect the projects had on the specific local causes of local poverty conditions. Each local initiative project will be evaluated in a manner consistent with federal Health and Human Services Department Results Oriented Management and Accountability (ROMA) guidelines for CSBG programs.

Allocation of Funds

Based on Missouri's FFY07 CSBG Award FFY2008 and FFY2009 local initiative fund allocation is estimated to be as follows:

| | |
|---|---|
| Community Coordination/Resource Development | $3,209,899 |
| Family Development | |
| Intake/Assessment/Referral | $4,309,753 |
| Family Crisis Response | $ 397,709 |
| Family Support | $1,000,000 |
| Local Supplements | $6,706,184 |

Other FFY2008 and FFY2009 dollars that become available will be allocated by the State to one or more of these initiatives. In addition, at least $1,500,000 will be used to support state discretionary activities. The following activities are anticipated: Provide training and technical assistance and capacity building activities to local providers; coordinate state and locally operated programs, and in some cases programs operated by eligible entities; support statewide eligible entity reporting, coordination and communication among eligible entities; emergency disaster assistance; and support and reward innovative programs conducted by community action agencies, local units of

government, Native American organizations, and other community-based organizations. Entities other than community action agencies may receive state discretionary funds. Also, up to $236,000 may be used by the State for program implementation and monitoring. Portions of the latter amount may be used for the former purpose.

Audit

CSBG legislation requires that at least every year the State prepare an audit of expenditures of CSBG amounts received. The audit must be prepared in accordance with the General Accounting Office Standard for Audits of Governmental Organizations. An audit confirming adequate internal accounting control with no questioned costs is the objective of the State and the State will operate the CSBG program in such a manner as to get this result.

The State will demand program accountability and payment to Providers will be based upon program performance. The State will be able to verify that it received what it purchased. Through this practice of fiscal accountability, the State will have protected its assets and will have prudently done so.

Equal Opportunity

No person, on the basis of race, color, national origin, or sex may be excluded from participation in, be denied the benefits of, or be subjected to discrimination under, any program or activity funded in whole or in part with CSBG funds.

Any prohibition against discrimination on the basis of age under the Age Discrimination Act of 1975 or with respect to an otherwise qualified individual with a disability as provided in Section 504 of the Rehabilitation Act of 1973 shall also apply to any such program or activity.

In addition, the State complies with the provisions of Title VI of the Civil Rights Act of 1964. To assure compliance, the State will incorporate the provisions and prohibitions into all FFY2008-2009 CSBG contracts. Providers must comply with any equal opportunity package prepared by the State. Providers will be required to include these provisions in any contractual agreements that they may enter into with a subcontractor; however, the Provider will be held responsible for contract compliance whether or not a subcontractor fails to comply with non-discrimination provisions, the contract may be suspended or terminated.

Public Review and Comment

CSBG legislation requires that a plan for the proposed use of CSBG funds in Missouri be made available for public review and comment. A notice will be published in newspapers across the State informing Missourians that copies of the plan are available. In addition the Departmental Legislative Budget Appropriation Committee reviews Division of Family Services funding requests each year including the Community Services Block Grant.

**Program Calendar**

| | |
|---|---|
| **FFY08** | |
| June 6-7, 2007 | Initial CSBG Program Requirements Announced to Eligible Entities |
| July 27, 2007 | Public Hearing |
| August 2007 | Final CSBG Program Requirements Announced |
| August 2007 | Providers FFY08 and FFY09 Local Plans Returned |
| September 1, 2007 | FFY08 and FFY09 State Application Filed with HHS. |
| September 30, 2007 | Provider Contracts Awarded |
| October 1, 2007 | FFY08 Program Implementation Begins |

**FFY09**

| | |
|---|---|
| June 2008 | Provider Technical Assistance Meeting |
| August 2008 | Modifications to Contract submitted by Providers |
| September 2008 | Modifications and Amendments Fully Executed |
| October 1, 2008 | FFY09 Program Implementation Begins. |

Note: FFY08 and FFY09 contract will be modified and extended to cover FFY10.

CORRECTIVE ACTION, TERMINATION AND REDUCTION OF FUNDING

(Section Extracted from the Missouri Contract for the Purchase of Community Services Block Grant)

35. Funding terminations or reductions may occur prior to the date agreed upon by the parties herein in the following manner:

35.1 Basis for Reduction. For purposes of making a determination with respect to a funding reduction, the term "cause" includes:

A. A statewide redistribution of funds under this subtitle to respond to:
1. the results of the recently available census or other appropriate data;
2. the establishment of a new eligible entity;
3. severe economic dislocation; and

B. The failure of Provider to comply with the terms of this agreement including the State plan, or to meet a requirement of the Division.

35.2 Basis for Termination. For purposes of making a determination with respect to funding termination, the term "cause" includes the failure of Provider to comply with the terms of this agreement including the State plan, or to meet a requirement of the Division.

35.3 Determination. If the Division determines on the basis of a final decision in a monitoring review that Provider fails to comply with the terms of this agreement, or the State plan, or to provide services, or to meet appropriate standards, goals, or other requirements established by the Division, including performance objectives, the Division will:

a. Inform the Provider of the deficiency to be corrected.

b. Require the Provider to correct the deficiency.

c. Offer training and technical assistance, if appropriate, as determined by the Division.

d. At the Division's discretion, allow the Provider to develop and implement, within sixty days after 35.3.a above, a quality improvement plan to correct the deficiency within a reasonable time as determined by the Division.

e. Not later than thirty days after receiving a plan identified in 35.3.d, either approve Provider's quality improvement plan or specify why the proposed plan cannot be approved.

f. After providing written notice at least thirty working days prior, and opportunity for hearing, initiate proceedings to terminate the designation of or reduce the funding of Provider unless the Provider corrects the deficiency.

35.4 Review. A determination to terminate the designation or reduce the funding of Provider is reviewable by the Secretary of the Department of Health and Human Services. The determination is effective as specified in the Act.

35.5 Reinstatement. The Division may reinstate designation or funding if it determines that conditions warrant such action.

35.6 Obligations. When a contract is terminated for cause, the Provider shall not incur new obligations for the terminated portion after the effective date, and shall cancel as many outstanding obligations as possible. The Division shall allow full credit to the Provider for any completed work that the Division deems satisfactory.