



MISSOURI DEPARTMENT of SOCIAL SERVICES
COMMUNITY SERVICES BLOCK GRANT (CSBG)
MANUAL of POLICIES & PROCEDURES

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Services
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Table of Contents

PREFACE	5
SECTION 1 – NONDISCRIMINATION	6
1.1 NONDISCRIMINATION	6
SECTION 2 – PROGRAM SCOPE	7
2.1 SERVICES AND ACTIVITIES	7
SECTION 3 – STATE PLAN, FUNDING AND PROGRAM CYCLES	9
3.1 CSBG STATE PLAN	9
3.2 FUNDING CYCLE	10
3.3 ALLOCATION	10
3.4 PROGRAM YEAR	11
SECTION 4 – GRANT ADMINISTRATION	12
4.1 TRAINING and TECHNICAL ASSISTANCE	12
4.2 MONITORING	12
4.3 CSBG ORGANIZATIONAL STANDARDS	15
4.4 CORRECTIVE ACTION	16
4.5 DESIGNATION AS “HIGH RISK”	17
4.6 DESIGNATION AND DE-DESIGNATION	19
4.7 PROGRAM REPORTS	20
SECTION 5 – GRANT APPLICATION AND PROCEDURES	22
5.1 APPLICATION for CSBG NON-DISCRETIONARY FUNDS	22
5.2 WORK PLANS	23
5.3 GRANT AWARD	24
5.3 GRANT REVISIONS	25
5.5 AWARD AMOUNTS	27
SECTION 6 – GOVERNING BOARDS	28
6.1 BOARD COMPOSITION	28
6.2 BOARD ROLES AND RESPONSIBILITIES	30
6.3 BYLAWS’ REQUIREMENTS	32
6.4 ALLOWABLE COSTS	35
6.5 GENERAL	36
SECTION 7 – PLANNING	37
7.1 COMMUNITY ASSESSMENT	37
7.2 STRATEGIC PLAN	38
7.3 CALENDAR OF PLANNING ACTIVITIES	39
SECTION 8 – SERVICE DELIVERY	40
8.1 GENERAL	40
SECTION 9 – FISCAL POLICIES AND PROCEDURES	45
9.1 GENERAL	45
9.2 GRANT PAYMENT PROCESS	46
9.3 EXPENDITURES	47
9.4 PROPERTY MANAGEMENT	49
9.5 BONDING AND INSURANCE	50
9.6 RETENTION OF RECORDS	51
9.7 AUDITS	51
9.8 EFT	52

SECTION 10 – PERSONNEL POLICIES AND PROCEDURES.....	53
10.1 GENERAL	53
10.2 CODE OF ETHICS	55
10.3 FRAUD, ABUSE, OR MISCONDUCT.....	56
10.4 BACKGROUND SCREENING.....	57
10.5 THE FEDERAL HATCH ACT.....	58
SECTION 11 – GENERAL.....	61
11.1 CITIZEN ACCESS AND PRIVACY	61
11.2 COORDINATION WITH MISSOURI LIHEAP	61
11.3 COORDINATION WITH OTHERS INCLUDING WORKFORCE SYSTEMS.....	62
11.4 COMPLAINTS/APPEALS.....	63
11.5 PARTISAN/NON-PARTISAN POLITICAL ACTIVITY.....	64
11.6 STEVENS AMENDMENT	64
SECTION 12 – DISCRETIONARY FUNDS.....	65
12.1 GENERAL	65
12.2 AVAILABILITY OF FUNDS.....	66
12.3 FUNDING GUIDANCE.....	66
12.4 REPORTING REQUIREMENTS.....	66
12.5 MONITORING	66
DEFINITIONS.....	67
INFORMATION MEMORANDA.....	71

The National Community Action Network Theory of Change

Community Action Goals

Goal 1: Individuals and families with low incomes are stable and achieve economic security.

Goal 2: Communities where people with low incomes live are healthy and offer economic opportunity.

Goal 3: People with low incomes are engaged and active in building opportunities in communities.



Services and Strategies

Employment



Education & Cognitive Development

Income, Infrastructure & Asset Building



Housing

Health/Social Behavioral Development



Civic Engagement & Community Involvement

Core Principles

- Recognize the complexity of the issues of poverty
- Build local solutions specific to local needs
- Support family stability as a foundation for economic security
- Advocate for systemic change
- Pursue positive individual, family, and community level change
- Maximize involvement of people with low incomes
- Engage local community partners and citizens in solutions
- Leverage state, federal, and community resources

Performance Management

How well does the network operate?

What difference does the network make?

- Local Organizational Standards
- State and Federal Accountability Measures
- Results Oriented Management and Accountability System

- Individual and Family National Performance Indicators
- Community National Performance Indicators

A national network of over 1,000 high performing Community Action Agencies, State Associations, State offices, and Federal partners supported by the Community Services Block Grant (CSBG) to mobilize communities to fight poverty.

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Preface

The Missouri Department of Social Services (DSS) has been designated by the Governor as the lead agency for purposes of carrying out activities under the Community Services Block Grant (CSBG). This is a federal block grant that helps fund a network of local Community Action Agencies that help create, coordinate, and deliver programs and services to low-income Missourians.

CSBG is governed by the Coats Human Services Reauthorization Act of 1998 (commonly referred to as the CSBG Reauthorization Act of 1998), 42 USC § 9901, et seq., (as amended), Notices of Financial Award and Grant Contracts, this Missouri Community Services Block Grant Manual of Policies and Procedures, and OMB Uniform Guidance. In the case of ambiguity or conflict, the following order of precedence must govern:

- 1. Enabling CSBG Legislation*
- 2. Applicable OMB Circulars*
- 3. Applicable Department of Health and Human Services Terms and Conditions*
- 4. Missouri State Legislation and Code of State Regulations*
- 5. DSS Grant Contract with Community Action Agencies*
- 6. DSS Grant Contract with eligible providers*
- 7. CSBG Manual of Policies and Procedures as provided by DSS*

Organizations granted CSBG funds must conform to the applicable laws, policies and procedures contained within these documents. Failure to do so may jeopardize CSBG funding.

SECTION 1 – NONDISCRIMINATION

1.1 NONDISCRIMINATION

- 1.1.1 The Federal Civil Rights Act of 1964 as amended (42 USC § 2000d) prohibits discrimination on the grounds of color, religion, sex, or national origin. No person may be discriminated against on these grounds in applying for or participating in Federally funded assistance or programs.
- 1.1.2 Any program or activity supported by funds from DSS must comply with this Act as well as other Federal and State statutes relating to nondiscrimination, including but not limited to:
- A. Title IX of the Education Amendments of 1972 which states that no person, on the basis of sex, shall be excluded from participation in, be denied the benefits of or be subjected to discrimination under any education program or activity receiving Federal financial assistance.
 - B. Americans with Disabilities Act (ADA) as amended (42 USC § 12101 et seq.) which requires that any person otherwise qualified with a disability shall not be excluded from participation in, or denied the benefits of or otherwise subjected to discrimination in any program or activity receiving Federal assistance, by reason of that disability.
 - C. The 1975 Age Discrimination Act as amended (42 USC § 6101 et seq.) provides that no person shall be excluded from participation, denied program benefits, or subjected to discrimination on the basis of age, under any program or activity receiving Federal funds.
 - D. Other Federal, State or local nondiscrimination statutes which may apply.

SECTION 2 – PROGRAM SCOPE

2.1 SERVICES AND ACTIVITIES

2.1.1 The CSBG program was established through the Economic Opportunity Act of 1964 as a centerpiece in the War on Poverty. The purpose was “to provide stimulation and incentive for urban and rural communities to mobilize their resources to combat poverty.”

2.1.2 President Reagan, through the Omnibus Budget Reconciliation Act of 1981, consolidated domestic social programs into several large block grants, including the CSBG program. Responsibility for administering the block grant programs was delegated to the states.

2.1.3 The CSBG program was most recently authorized in 1998 through Title II of the Coats Human Services Reauthorization Act of 1998. The purpose of the CSBG program pursuant to 42 U.S.C. § 9901, amended, is “to provide assistance to States and local communities, working through a network of community action agencies and other neighborhood-based organizations, for the reduction of poverty, the revitalization of low-income communities, and the empowerment of low- income families and individuals in rural and urban areas to become fully self-sufficient [particularly families who are attempting to transition off a State program carried out under Part A of Title IV of the Social Security Act (42 U.S.C. § 601 et seq)].” CSBG Eligible Entities must use CSBG funds to accomplish one or more of the goals described in 2.1.3 above through:

- A. “The strengthening of community capabilities for planning and coordinating the use of a broad range of Federal, State, local and other assistance (including private resources) related to the elimination of poverty, so that this assistance can be used in a manner responsive to local needs and conditions,
- B. “The organization of a range of services related to the needs of low-income families and individuals, so that these services may have a measurable and potentially major impact on the causes of poverty in the community and may help the families and individuals to achieve self-sufficiency,
- C. “The greater use of innovative and effective community-based approaches to attacking the causes and effects of poverty and of community breakdown,
- D. “The maximum participation of residents of the low-income communities and members of the groups served by programs assisted through the block grants to empower such residents and members to respond to the unique problems and needs within their communities and

- E. “The broadening of the resource base of programs directed to the elimination of poverty so as to secure a more active role in the provision of services for private, religious, charitable and neighborhood-based organizations; and individual citizens and business, labor and professional groups, who are able to influence the quantity and quality of opportunities and services for the poor.”

2.1.4 CSBG activities are carried out by Community Action Agencies (CAAs) in Missouri.

- A. A CSBG Eligible Entity or CAA, is a private, not-for-profit agency within the state of Missouri as defined by 42 U.S.C. § 9902, as amended; an eligible entity is one that carried a designation as a CSBG Eligible Entity (CAA) or was a qualifying organization serving migrant or seasonal farm workers as of the day before the enactment of the Coats Human Services Reauthorization Act of 1998; has retained that designation and has a tripartite board or one that, subsequent to and in accordance with statute, has been designated by the Governor.

2.1.5 The National Community Action Theory of Change (TOC) provides three (3) overarching community action goals for CAAs:

- A. Individuals and families with low incomes are stable and achieve economic security.
- B. Communities where people with low incomes live are healthy and offer economic security.
- C. People with low incomes are engaged and active in building opportunities in communities.

SECTION 3 – STATE PLAN, FUNDING AND PROGRAM CYCLES

3.1 CSBG STATE PLAN

3.1.1 The CSBG legislation requires that states submit state plans to the Office of Community Services (OCS), U.S. Department of Health and Human Services (DHHS). State plans are to describe the state's proposed use of CSBG funds and include assurances that CSBG will be used in accordance with legislative intent. State plans are due on or before September 1 preceding the start of the Federal Fiscal Year (FFY) for which funds are granted from DHHS to the states. The FFY runs annually from October 1 – September 30.

3.1.2 The State Plan will cover a period of not less than one FFY and not more than two FFYs.

3.1.3 DSS, will prepare a State Plan by September 1, after receiving instructions from OCS.

- A. The draft Missouri State Plan will be posted to the DSS website. DSS will alert the CAAs, MCAN, and the public to the posting.
- B. Prior to the submission of the Missouri State Plan, DSS will identify a date, time and location for a public hearing. During the public hearing, DSS will present the draft state plan and receive comments. The hearing will be open to the public.
- C. Notice of the State Plan public hearing will be posted electronically to social media, and through GovDelivery and text blasts, provided electronically to Missouri legislators through house and senate designated contacts, provided to the Missouri Office of Administration for inclusion on the public open meeting notice statewide website, and both the hearing notice and draft Missouri State Plan will be posted to the DSS website.
- D. Written comments will be accepted by DSS up to the date of the public hearing. Written comments received accordingly, and testimony provided at the public hearing, will be reviewed by the CSBG Program Manager or designee. Written comments and testimony received during the public hearings will be submitted to DSS Administrative Staff, and made available upon request.
- E. Revisions to the Missouri State Plan may be made in response to written and verbal comments.

3.1.4 The State holds at least one legislative hearing every three years in conjunction with the development of the State Plan. These hearings usually take place in the first or second

quarter of the calendar year. DSS staff will present testimony on the uses and value of CSBG funds at the legislative hearing.

- 3.1.5 Within three business days of receiving notification that the legislative hearing has been scheduled, DSS will notify all CAAs and MCAN of the time, place, and format of the hearing. Notice of the legislative hearing will be posted to the DSS website. Interested parties may be invited to offer testimony. Testimony and legislator comments are considered in drafting the subsequent Missouri State Plan.

3.2 FUNDING CYCLE

3.2.1 The funding cycle for CSBG is the FFY (October 1 through September 30). Though the FFY starts on October 1, the federal allocation is often delayed, by several months. In accordance with State Accountability Measures, DSS bases initial allocations off of the amount of the previous year. DSS updates allocations to agencies within thirty (30) days of receipt of full funding award and will provide funds without interruption after the full funding award is received.

3.2.2 At the request of an agency, due to need, advance payments may be made on a case by case basis any time after the CSBG allocation has been made to the state.

3.3 ALLOCATION

3.3.1 States are required to allocate at least 90 percent of their CSBG allocation to Community Action Agencies. No more than 5 percent of the allocation may be used for the State's administrative expenses. The remaining CSBG funds may be used at the State's discretion to support activities consistent with the purposes of the CSBG legislation.

3.3.2 The DSS shall allocate the 90% mandatory funds on the basis of FFY beginning October 1 as follows:

- A. A portion of the mandatory funds shall be distributed such that each CAA shall receive a base amount of two hundred thousand dollars (\$200,000);
- B. The portion of mandatory funds remaining after deducting the sum of the base amount awarded to CAAs shall be distributed based on the CAA's poverty population relative to the state's total poverty population utilizing the following formula: $((\text{Total mandatory funds}) - (\$200,000 \times \# \text{ of CAAs})) \times (\text{poverty population of the CAA} / \text{total state poverty population}) = \text{CAA poverty population allocation}.$

1. Total state poverty population shall be the total poverty population according to the most recent data published annually by the American Community Survey of the United States Census Bureau.
2. The poverty population of the designated geographic area served by a CAA shall be the total poverty population within the area as determined by the most recent data published by the American Community Survey of the United States Census Bureau.

3.4 PROGRAM YEAR

3.4.1 The program year for Missouri CSBG is October 1 through September 30 of the following year. CAAs must build their budgets and structure their reporting in the CSBG Annual Report for twelve-month (October through September) of the FFY.

SECTION 4 – GRANT ADMINISTRATION

4.1 TRAINING and TECHNICAL ASSISTANCE

4.1.1 DSS, as the state lead agency, has responsibility for providing entities receiving CSBG funds with a range of technical assistance and training in order to establish and maintain sound grants management and program practices. Technical assistance may be provided by DSS, or through contract with a third party.

4.1.2 As part of the application and budget process, DSS staff will be available to assist with the development of Community Action Plans (also known as Work Plans) and budgets that meet application standards. Technical assistance will be responsive to individual need.

4.2 MONITORING

4.2.1 Under the block grant framework established in the CSBG Act, States have both the authority and the responsibility for effective oversight of eligible entities that receive CSBG funds. Section 678B of the CSBG Act (42 U.S.C. §9914) requires State CSBG Lead Agencies to establish “performance goals, administrative standards, financial management requirements, and other requirements” that ensure an appropriate level of accountability and quality among the State’s eligible entities.

4.2.2 Monitoring is an on-going process and is not strictly limited to the periodic “on-site monitoring visit.” The on-going process includes review of grant applications, quarterly reports, monthly invoices, independent audit reports, board meeting notices, agendas, and minutes, and the review of monitoring reports from other oversight and funding entities.

4.2.3 To the extent feasible, DSS incorporates the CSBG Monitoring Standards, as published by National Association for State Community Services Programs (NASCSPP) (September 2017), in the DSS monitoring process. Additionally, DSS follows the three monitoring principles described in NASCSPP’s CSBG Monitoring Standards guidance:

- A. Mutual Respect – DSS values and recognize the unique knowledge, ability, and independence of each person. DSS is committed to treating all persons fairly and maintaining credibility by matching actions with words.
- B. Open Communication – Effective communication is key in facilitating good working relationships with partners, and DSS is committed to keeping lines of communication open. The purpose of communication is to assist in developing solutions to problems, to share program improvement ideas, and provide

information on new developments in the anti-poverty field. DSS communicates frequently through tools and media. State CSBG offices should be open to contact and are committed to listening to suggestions/concerns. This aids the DSS in gaining an understanding of local operations and assisting CAAs in pursuing priorities.

- C. Joint Problem Solving - DSS operates under the basic belief that a team approach to problem solving is in the best interest of all parties involved. DSS sincerely believe that collectively DSS and the CAA can arrive at the best solution to any situation. Through a team approach to problem solving, DSS thinks outside traditional methods and come up with the best strategies for program development, conflict resolution, or compliance issues. DSS wants to promote an environment in which DSS and all Community Action partners will be open to change and can work together in exploring options and developing mutually agreeable solutions. The goal is to have agencies function independently— with DSS support—to meet the needs of local communities within the parameters set by legislation.

4.2.4 Written notice of the date and purpose of the monitoring visit will be provided thirty (30) days in advance, along with a copy of the **Monitoring Manual**. Please refer to Part II of this Monitoring Manual for a list of files and documents that must be sent to DSS *prior to* the visit, as well as those that should be made available upon DSS arrival.

4.2.5 CAAs can anticipate an on-site review by DSS staff for the purposes of monitoring at least every three years, or more frequently as necessary. DSS will conduct an on-site review of each newly designated CAA immediately after the completion of the first year in which such entity receives CSBG funds.

A typical visit can be expected to require three to four days. The DSS monitor(s) will:

- A. Offer both an entrance and exit conference.
 - 1. The entrance conference will be held with the agency Executive Director/CEO, program managers, site managers/coordinators, available board members, and other appropriate staff to explain the purpose of the visit and clarify expectations.
 - 2. The exit conference will be held with the agency Executive Director/CEO, program managers, site managers/coordinators, available board members, and other appropriate staff on the last day of the visit to identify findings and suggest strategies for corrective action if problems are discovered.

- B. Allow the agency one week to submit any review rebuttals. Rebuttals received within

that timeframe will be reviewed and a decision signed off on by the CSBG Program Manager. Responses to the rebuttal will be provided to the agency within 60 days.

- C. Provide a full written monitoring report no more than sixty (60) days following the site visit. This summary will be distributed to the CAA's Executive Director/CEO and to the chairperson of the governing board, and/or other designated staff as appointed by the Executive Director/CEO. The written report will clearly identify deficiencies, if any, as compliance issues and/or findings and may include a discussion of best practices, concerns, and opportunities.
- D. Request a written corrective action plan within sixty (60) days of receipt of the full monitoring report for all findings identified within the report.
- E. Review any corrective action plans submitted and issue a response to the CAA within thirty (30) days.

4.2.6 Monitoring may include, but is not limited to, a review of:

- A. Program policies and procedures.
- B. Income guidelines and verification procedures.
- C. Intake forms and procedures.
- D. Program work plans and activities.
- E. CSBG administrative files.
- F. Personnel policies, files, and job descriptions.
- G. Inventory and procurement procedures.
- H. Cooperative agreements and contracts, including consultant contracts.
- I. Organizational structure and lines of authority.
- J. Board member files, bylaws, and meeting documentation.
- K. Adherence to Federal and State guidelines and requirements.
- L. Fiscal policies and practices.
- M. Service activity reports, data tracking and reporting systems and supporting documentation.
- N. Assessment of CSBG Organizational Standards.
- O. Data security.

4.2.7 Monitoring may also include:

- A. Interviews with program staff regarding program operations and job functions.
- B. Interviews with administrative and fiscal staff.
- C. Interviews with members of the governing board.
- D. Anyone else identified by DSS or CAA.

4.3 CSBG ORGANIZATIONAL STANDARDS

4.3.1 CSBG [Information Memorandum 138](#) (January 2015) describes the State’s authority and responsibility to establish and assess organizational standards. Section 678B of the CSBG Act requires states to establish “performance goals, administrative standards, financial management requirements, and other requirements that ensure an appropriate level of accountability and quality among the state’s Community Action Agencies.”

4.3.2 DSS utilizes the Center of Excellence’s (COE) CSBG Organizational Standards [COE CSGB Organizational Standards](#) to measure the accountability and quality of the CAAs. The COE-developed Organizational Standards are organized in three (3) thematic groups containing nine (9) categories and fifty-eight (58) standards for private entities/CAAs.

4.3.3 DSS is responsible for assessing each CAA’s compliance with the Organizational Standards annually and for reporting the percentage of CAAs meeting 100% of the Standards each year in the applicable sections of the CSBG Annual Report, Module 1.

4.3.4 CAAs must use the system selected and approved by DSS for tracking and reporting their compliance with the CSBG Organizational Standards and must submit documentation sufficient to demonstrate compliance with the Standards. For a detailed list of the types of documentation required, at minimum, to meet the Standards, please see the DSS [Documentation Guide for Organizational Standards](#) [COE CSGB Organizational Standards](#).

4.3.5 Annually, DSS staff conduct a full desk assessment according to the following plan:

- A. CAAs must submit, by November 30, supporting documentation for all Organizational Standards.
- B. Once the annual submission date has closed, DSS will perform its desk assessment of all submitted documentation. After the review is complete, DSS will offer a cure period that enables CAAs to provide clarification or corrected documents for any standards found to be unmet (see [Key Dates](#) document for timelines).
- C. Once the cure period has passed, DSS staff will issue one of the following reports for any remaining unmet standards by February 1:
 - 1. Technical Assistance Plan (TAP) for any standard found to be unmet for the first

time.

2. Quality Improvement Plan (QIP) for any standard not met during current and any previous fiscal year.

4.3.6 During those years when DSS staff conducts an on-site monitoring visit of a CAA, DSS will review the most recent annual assessment of the Organizational Standards, and the results will be included in the monitoring report as a Finding (a Standard Not Met for two or more years) or a Concern (a Standard Not Met for the first time). DSS staff will provide targeted training and technical assistance during the visit to move a CAA towards compliance with all Standards.

4.4 CORRECTIVE ACTION

4.4.1 Finding(s) identified through CSBG on-site monitoring or the assessment of the CSBG Organizational Standards and included in the monitoring report require a response from the CAA. At DSS's discretion, the response must take the form of a written TAP and/or a QIP and must specify the steps the CAA will take to correct the Finding(s) and the timeframe, as proposed by the CAA and approved by DSS, for completing the plan. Alternately, the CAA may provide documentation that will allow the need for the TAP and/or a QIP for the issue in question to be waived.

A. The provision of documentation allowing waiver of a TAP and/or a QIP must occur within fifteen (15) days following the issuance of the monitoring report, or a mutually agreed upon deadline.

1. DSS will respond within ten (10) business days of receipt of such documentation.

B. The TAP and/or QIP is due to DSS within sixty (60) days following the issuance of the monitoring report. The due date will be communicated at the time the monitoring report is issued.

1. Upon request, assistance in the development of a TAP and/or a QIP will be provided.

2. A TAP will be required for minor compliance issues. A QIP will be required for serious compliance issues or compliance issues that are repeated or extended duration.

3. DSS will notify the CAA whether a TAP or a QIP is required at the time the monitoring report is issued.

4. DSS may make available training and technical assistance, if appropriate, to help the CAA correctly identified deficiencies or failures in meeting State and/or Federal requirements.

C. DSS staff will review and respond to the TAP and/or QIP within 30 days of its receipt.

1. In the event that DSS does not approve the proposed TAP or QIP, the CAA shall submit a revised corrective action plan to DSS within fifteen (15) calendar days.

2. The OCS will be advised of DSS's acceptance of the QIP within thirty (30) calendar days of DSS's acceptance of the plan.

D. The CAA's implementation of a TAP and/or QIP must occur within thirty (30) days following DSS's acceptance of the TAP or QIP.

E. DSS staff will monitor progress toward the completion of the TAP or QIP.

1. CAAs must provide reports detailing progress in completing the TAP and/or QIP as prescribed within DSS's notification of the plan's acceptance.

a. At a minimum, DSS will require a quarterly report detailing progress in completing the TAP and/or QIP. The due dates of the reports will be determined by DSS and communicated when the TAP or QIP is accepted.

2. DSS personnel will review reports on submission and will issue a closure notice when satisfied that any compliance matter/finding has been resolved. CAAs must continue to provide progress reports until DSS provides notification that all compliance matters are resolved.

3. Once all Compliance Matters/Findings addressed within a QIP have been resolved, DSS staff will advise OCS within thirty (30) days of the closure of the plan.

4.4.2 Uncorrected Compliance Matters/Findings may cause the State, in accordance with 42 CFR § 9915 and CSBG Information Memorandum 116, to proceed with the process of removing a CAA's designation as a CSBG-eligible entity. (Item 4.6.1)

4.5 DESIGNATION AS "HIGH RISK"

4.5.1 DSS may designate a CAA to be "high risk" if DSS determines that it has a history of unsatisfactory performance, is not financially stable, has not conformed to terms and conditions of previous awards or is not otherwise responsible. Examples of indicators that may lead to a designation of "high risk" include:

A. Uncorrected Compliance Matters/Findings.

- B. CAA is unresponsive to and/or noncompliant with DSS requests and requirements.
- C. CAA consistently fails to meet deadlines.
- D. The CAA's adherence to its approved operating documents (including bylaws, personnel policy, and fiscal policy) is significantly inconsistent.
- E. Record keeping related to board and committee activity is not systematic. The corporate record is, as a result, incomplete.
- F. Abrupt departure of the Executive Director/CEO and/or the fiscal officer.
- G. The single audit contains one or more significant findings relevant to the CAA's capacity to successfully administer its programs.
- H. Failure without cause to meet multiple performance targets defined within the CAA's approved Community Action Plan.
- I. CSBG percent of revenue exceeds one half of the CAA's total revenue.
- J. CAA lacks connection and a demonstrated commitment to the broader community action network.
- K. Findings in other programs administered by the agency

4.5.2 CAAs designated as "high risk" will be notified in writing as to the specific findings or deficiencies and must be required to remedy the situation within a specific timeline or to develop and implement a QIP.

4.5.3 Special sanctions may apply to CAAs assigned high risk status and may include, among other sanctions:

- A. Payment of grant funds on a reimbursement basis only.
- B. A requirement to provide additional and/or more detailed financial reports.
- C. The establishment of a need to gain additional prior approvals as determined by DSS.
- D. Additional and/or more frequent monitoring.
- E. A requirement to obtain technical and/or management assistance and, as a result, demonstrate improvement.
- F. The consideration of CSBG discretionary grant proposals only for projects designed to

alleviate the condition that resulted in the designation of high risk.

4.6 DESIGNATION AND DE-DESIGNATION

4.6.1 [CSBG Information Memorandum 116](#) provides a step-by step process outlining necessary actions and considerations for terminating or reducing funds to a CSBG Eligible Entity for cause and will guide the Department's designation and de-designation of Community Action Agencies.

A. The steps outlined in IM 116 are detailed below:

Step 1: State conducts monitoring review pursuant to section 676B.

Step 2: State determines, on the basis of a final decision in a monitoring review that the eligible entity fails to comply with the terms of an agreement, or the State plan, or to provide services under this subtitle or to meet appropriate standards, goals, and other requirements established by the State (including performance objectives).

Step 3: State informs the entity of the deficiency to be corrected.

Step 4: State requires the entity to correct the deficiency.

Step 5: State determines whether training or technical assistance is appropriate.

Step 6: State offers training and technical assistance, if appropriate, to help correct the deficiency.

Step 7: State either (A) prepares and submits to the Secretary a report describing the training and technical assistance offered; or (B) if the State determines that such training and technical assistance is not appropriate, prepares and submits to the Secretary a report stating the reasons for the determination.

Step 8: At the discretion of the State, the State allows the entity to develop and implement, within 60 days after being informed of the deficiency, a Quality Improvement Plan to correct such deficiency within a reasonable period of time, as determined by the State.

Step 9: State provides adequate notice and an opportunity for a hearing.

Step 10: State initiates proceedings to terminate the designation of or reduce the funding under this subtitle of the eligible entity unless the entity corrects the deficiency.

4.6.2 In the event DSS terminates the designation of a CAA as an eligible entity, any resulting funding may be awarded only to a CAA that is an eligible entity for CSBG funds. In

accordance with the CSBG Act, a State may solicit applications and designate as an eligible entity an organization that demonstrates effectiveness in meeting the goals of the CSBG Act and may give priority to an eligible entity in a contiguous area that is already providing related services in the un-served area.

4.7 PROGRAM REPORTS

4.7.1 Program reports consist of quarterly reports (CSBG Annual Report Module 4 and supportive comments) and year-end reports (CSBG Annual Report Modules 2 and 3). Each CAA must submit reports on activities supported by CSBG funds. Where CSBG funds are used to support the entity infrastructure, CSBG is considered to impact all programs and services. CAAs are therefore guided to provide information reflective of the total entity impact on the causes and effects of poverty.

4.7.2 DSS recognizes the three national goals, the goal indicators and sub-indicators as established by the NASCSP. Each agency is guided to report on all performance indicators identified within its Community Action Plan and is encouraged to report on any ancillary activity.

4.7.3 Quarterly reports and year-end reports are to be submitted in the Organizational Standards Assessment System. CAAs must maintain documentation that can authenticate report data. CAAs must use the reporting forms identified and/or provided by DSS.

A. Module 4 quarterly reports and Narrative reports are due as follows:

- First quarter, October through December are due by January 15.
- Second quarter, January through March are due by April 15.
- Third quarter, April through June are due by July 15.
- Fourth quarter, July through September are due by October 15.

B. Module 4 quarterly reports will be cumulative reports, including data reported in previous quarter(s) plus new data from the current quarter.

C. Module 2 data will be reported annually. The module 2 year-end report is due based on dates within the [Key Dates](#) document, although subject to change upon notification of Annual Report due date and availability of SmartForms (fillable forms) from Federal partners.

D. Module 3 data will be reported annually. The module 3 year-end report is due based on dates within the [Key Dates](#) document, although subject to change upon notification of Annual Report due date and availability of SmartForms from Federal partners.

4.7.4 In the event that agency CAA fails to submit reports in compliance with provisions set forth in this section, the following steps may be taken:

- A. DSS staff will communicate with the CAA director to inform him or her of the issue.
- B. A letter documenting the initial communication may follow.
- C. The chairperson of the board of directors may be notified of the failure to submit reports if the failure is significant and/or a recurring issue.

4.7.5 The CAA shall refer to the [CSBG Information Memorandum 152](#) or superseding guidance for additional information about increased accountability.

SECTION 5 – GRANT APPLICATION AND PROCEDURES

5.1 APPLICATION for CSBG NON-DISCRETIONARY FUNDS

5.1.1 To be eligible for a proportionate share of the 90 percent pass-through funding, an applicant must hold the designation of a CSBG Eligible Entity in the state of Missouri.

5.1.2 In order to receive funding for a given FFY, CAA are required to submit a DSS-approved Request for Proposal (RFP), hereinafter referred to as **Attachment 1**, to DSS.

A. DSS may require the CAA to develop and submit a new or revised RFP, budget, or budget narrative at other times throughout the funding period.

B. The RFP shall:

1. Include only allowable costs, programs, and/or services consistent with the provisions of the CSBG State Plan which can be accessed at <http://dss.mo.gov/fsd/csbg/>;
2. Satisfy the assurances required by 42 U.S.C. § 9908, as amended, described in Exhibit 4; and
3. Include written confirmation that the board has reviewed and approved the submitted RFP.

5.1.3 Prior to the start of the FFY in October, DSS will provide CAAs with RFP instructions and information.

A. To allow sufficient time for CAAs to prepare the RFP and to receive board approval of the RFP, the release of instructions will be targeted at least thirty (30) days prior to the due date. Agencies can find the relevant RFP issuance and due dates in the **Key Dates** document.

5.1.4 The RFP must include the following required elements:

- A. Description of Need
- B. Service Area, Facilities and Coordination of Services
- C. State Plan Assurances

- D. Key Personnel
- E. Agency Wide Funding Chart
- F. CSBG Budget Category Definitions
- G. Budget
- H. Budget Narrative
- I. Employee Allocation
- J. Additional information as may be required.

5.1.5 The complete RFP, including all elements as submitted to DSS, must be approved by the full board prior to submission.

A. If meeting schedules and the timeline for the preparation of the RFP do not allow consideration of the application by the full board, the applicant may submit, at a minimum, an executive summary and complete budget to its governing board or its executive committee for approval prior to the submission of the RFP. The highest-ranking officer of the board present at that meeting must, through his or her signature, attest to the body's approval of the submission of the RFP.

B. The RFP, including all elements as submitted to DSS, must be approved by the full board (rather than a committee) prior to DSS's acceptance of it.

5.1.6 The submission of one originally signed copy of the RFP will typically be required. Community Action Agencies may submit the signed copy of the RFP in the via email. The agency must ensure the submission is legible, complete, and contains all appropriate signatures.

5.1.7 Upon receipt, DSS staff will review the RFP to ensure that all required elements have been supplied. Entities submitting incomplete applications will be notified and required to submit the missing element(s). A contract will not be issued when required information is identified as absent.

5.2 WORK PLANS

5.2.1 On an annual basis, Missouri Community Action Agencies shall submit electronically to

DSS a draft Work Plan identifying agency-wide outcomes it intends to accomplish using the CSBG National Performance Indicators (NPIs) established by the National Association for State Community Services Programs (NASCSPP) pursuant to the CSBG Reauthorization Act, Section 678E(a)(1), 42 USC § 9917, as amended. Due dates for submission of agency Work Plans may be found in the [Key Dates](#) document.

- A. Agencies shall ensure proposed outcomes from all programs and activities the agency intends to report are consistent with the provisions of the CSBG State Plan which can be accessed at <http://dss.mo.gov/fsd/csbg>
- B. No funding shall be provided to the agency until the agency's Work Plan has received final, written approval by DSS.

5.2.2 Agencies shall implement the provisions of their grant contract in accordance with the DSS-approved Work Plan, hereinafter referred to as Attachment 2, which shall become a part of their contract as if fully set forth therein.

5.2.3 DSS may require the agency to develop and submit a revised Work Plan at other times throughout the life of the grant period.

- A. The agency shall prepare and submit all such documents as requested by DSS, within the timeframes specified by DSS in writing, and that written, specified timeframe shall become a part of their contract as if fully set forth therein.

5.3 GRANT AWARD

5.3.1 All grant awards (contracts) will be administered in accordance with applicable Federal and State rules and regulations.

5.3.2 Upon acceptance of the RFP, DSS will issue a letter of credit and grant award document (contract) which will include contractual provisions, notification of special grant conditions (if applicable) and other documentation which, from time to time, may be applicable. The accepted RFP is considered part of the binding agreement.

5.3.3 Grant award documents are issued based on the information submitted within the entity's RFP and subsequent modifications accepted by DSS.

5.3.4 Grant award documents will specify the amount of funds that the eligible entity is to receive and will stipulate the beginning and ending date of the grant period.

5.3.5 Grant award documents are not complete until all authorizing signatures have been added. These include the signatures of:

- A. Cognizant DSS officials,
- B. The chair or, in the case of incapacity, the vice-chair of the entity's governing board and
- C. The entity's Executive Director/CEO or designee as authorized by the agency.

5.3.6 Grant payments generally cannot be made in the absence of fully signed, complete grant award documents. However, under certain circumstances, and at DSS's discretion, advances may be paid.

5.3.7 The grant award documents are legally binding and set forth the manner in which the entity must, in accordance with the Order of Precedence, administer its CSBG award.

5.3 GRANT REVISIONS

5.4.1 Missouri Community Action Agencies may, at their discretion, develop and submit a revised RFP for DSS approval at other times throughout the award period. Prior approval for any changes to the scope, objectives, method, activities, services, or frequency of service delivery of the approved RFP must be obtained. No deviations are authorized without a signed grant award revision, with the exception of budget line item variances in accordance with allowable percentages, as stipulated in item 5.4.2.

- A. The agency shall not transfer any CSBG Direct Administrative funds that would cause the agency to exceed its Federally Negotiated Indirect Cost Rate (FNICR) or De Minimus Rate, whichever is applicable.

- 1. The agency shall refer to [CSBG Information Memorandum 37](#) or superseding guidance for additional information about direct and indirect administrative costs.

5.4.2 An entity is bound by the RFP and budget accepted by DSS. However, the transfer of funds between personnel, non-personnel and administration is allowable, up to fifteen (15) percent of the greater of a populated line item, not to exceed five (5) percent of the total approved budget, except when such a transfer results in a change to the scope or objectives enumerated in the application. Community Action Agencies must notify DSS in writing at least thirty (30) days in advance of any proposed budget line adjustments outside these limits.

- B. The agency shall notify DSS electronically of any changes in key staff identified in the

RFP within fifteen (15) days of such change and include the reason for such change.

5.4.3 Any adjustment of budget line items above the allowed percentage requires a written request and written acceptance by DSS prior to the adjustment. Unauthorized changes in the budget may be disallowed.

5.4.4 The revised RFP shall include the following:

- A. Detailed information addressing the need for the proposed change,
- B. Description of the impact that the change will have on services to low-income people,
- C. Updated budget sheets and budget narrative, as applicable,
- D. Updated work plan, if applicable,
- E. Updated performance targets, if applicable, and
- F. Evidence that the board of directors/administering board has reviewed and approved the amendment/revision.
 - 1. If meeting schedules and the timeline for the submission of the amendment/revision do not allow consideration of the amendment/revision by the full board, the applicant may secure approval for the amendment/revision from a duly authorized committee of the Board as defined within the entity's bylaws.

5.4.5 Revisions may be requested any time prior to the final sixty (60) days of the grant period. Revision requests submitted within this time frame which require correction must be corrected and received by DSS in an acceptable form no later than thirty (30) days prior to the end of the grant period. Only under special conditions, and with a written DSS waiver, will a revision request be accepted during the last sixty (60) days of the grant period.

5.4.6 DSS will respond in writing to revision requests within 30 days of the receipt of the request.

5.4.7 Missouri Community Action Agencies may, at their discretion, develop and submit a revised Work Plan for DSS approval at other times throughout the life of this grant period.

- A. Community Action Agencies must notify DSS electronically at least thirty (30) days in advance of any proposed changes in the Work Plan, which will affect the program scope, objectives, method, activities, services, or frequency of service delivery.

- B. Agencies shall not implement proposed changes in the Work Plan without the prior, written consent of DSS.

5.4.8 DSS will respond in writing to revision requests within 30 days of the receipt of the request.

5.4.9 In the event that DSS approves the agency's request to modify either the RFP or the Work Plan that affects the program scope, objectives, method, activities, services, or frequency of service delivery described in the approved RFP or Work Plan, an amendment to the grant contract may be required.

5.5 AWARD AMOUNTS

5.5.1 Each eligible entity's proportionate share may change in response to changes in the low- income population or to additions to, or deletions from, the number of Community Action Agencies within the State. For specific details regarding the allocation formula, please refer to section 3.3.

5.5.2 Payment of grant funds must be in accordance with applicable Federal regulations and DSS disbursement procedures. The Itemized CSBG Invoice (see Section 9) must be used to report expenses and receipts and to initiate a grant payment.

SECTION 6 – GOVERNING BOARDS

6.1 BOARD COMPOSITION

6.1.1 By statute, CSBG Eligible Entities (Community Action Agencies) are required to have governing boards (or in the case of a public entity, an administering board). To receive or continue to receive CSBG funds, Community Action Agencies must administer the CSBG program through, and maintain compliance with, the CSBG Act requirement for tripartite Boards pertaining to board composition and operation, as well as with applicable federal and state regulations and policies. CSBG [Information Memorandum 82](#) provides guidance on policy questions regarding the composition, roles, and responsibilities of local community action tripartite boards.

6.1.2 The Board must consist of not less than twelve (12) and not more than thirty-six (36) members (660.372.1, RSMo), selected in compliance with the following:

- A. One-third (1/3) of the members are elected public officials, holding office on the date of selection, or their representatives, except that if the number of such elected officials reasonably available and willing to serve on the board is less than one-third (1/3) of the membership of the board, membership on the board of appointive public officials or their representatives may be counted in meeting such one-third (1/3) requirement. These members shall hereafter be referred to as public sector representatives.
 - 1. Each public official may choose one representative to serve on the board in his or her stead. This member need not be a public official himself or herself, but he or she must assume the elected (or appointed) official's seat on the board.
 - 2. Entities wishing to exercise the seating of an appointed public official or their representative rather than an elected public official or their representative must secure approval from DSS. Documentation will be required to support the claim that the number of elected officials reasonably available and willing to serve, or appoint a representative to serve, is less than one-third (1/3) of the membership.
- B. Not fewer than one-third (1/3) of the members are persons chosen in accordance with democratic selection procedures adequate to ensure that these members are representative of low-income individuals and families in the neighborhood served. These members shall hereafter be referred to as low-income sector representatives.
- C. The remainder of the members are officials or members of business, industry, labor,

religious groups, law enforcement, welfare, education, or other major groups and interests in the community served. must comprise the remainder of the board. These members shall hereafter be referred to as private sector representatives. (42 U.S.C. § 9910, as amended)

6.1.3 Low-income sector representatives must be chosen by low-income individuals in accordance with democratic selection procedures adequate to assure that they represent the low-income persons in the geographic area served by the eligible entity. Among the selection procedures which may be used, either separately or in combination, are the following:

- A. Nominations followed by an election either within the neighborhood or within the community as a whole.
- B. Selection at a meeting or conference of low-income persons, such that the date, time and place of the meeting or conference have been adequately publicized.

6.1.4 Community Action Agencies must retain records documenting the democratic selection of low-income representatives seated on the board.

6.1.5 Low-income sector representatives selected to represent a specific geographic area within the community must reside within the area he or she represents.

6.1.6 To ensure an independent body, board members must not be related to one another or to the Executive Director/CEO. The following individuals meet the definition of “related”: domestic partner and biological-, adoptive-, foster- or step- father, mother, brother, sister, aunt, uncle, first cousin, son, daughter, mother-in law, father-in-law, brother-in-law, sister-in-law and grandparent.

6.1.7 No person may serve on the eligible entity’s board who is:

- A. A board member or employee of a delegate agency, except a delegate agency which is responsible for comprehensive community programming and planning for low-income areas served by the eligible entity.
- B. An employee of the eligible entity, DSS, or DHHS.

6.1.8 The board must establish procedures to ensure compliance with the requirements of Items 6.1.6 and 6.1.7.

- A. Evidence demonstrating compliance with this procedure must be maintained by the agency.

6.1.9 Prospective board members should be informed of the entity's expectations of their board and its members prior to their being seated as a member of the Board.

6.1.10 Prospective board members' names must be checked annually against the Federal government's "Excluded Parties List System" online database to ensure members are not suspended or disbarred from participating in Federal grant or contract programs. (2 CFR 180) This database is available online at www.sam.gov.

A. Evidence supporting members' eligibility to serve should be maintained by the agency.

6.1.11 A waiver to the minimum board size (Item 6.1.2) may be granted annually upon the presentation of written evidence that clearly demonstrates that the entity has been unable to identify a total of twelve (12) individuals willing to serve and that a lesser number is able to allow for full deliberation and diversity of thinking on governance and other organizational matters and can execute the roles and responsibilities contained herein. If granted, the waiver is temporary and expires at the conclusion of the grant period. Waiver requests must be accompanied with a detailed plan for reaching the minimum number of board members.

A. Examples of documentation that could be submitted with the waiver request are minutes showing the agency discussed vacant seats at a Head Start policy council, media posts, community minutes, etc.

B. Waiver requests must include an attestation that the governing board has approved the request.

C. Waiver requests are to be submitted to DSS prior to the start of the fiscal year.

D. DSS will respond to such requests within 30 days of receipt.

6.2 BOARD ROLES AND RESPONSIBILITIES

6.2.1 By statute, boards of directors/administering boards of CSBG-Community Action Agencies must fully participate in the development, planning, implementation and evaluation of programs and operations supported by CSBG funds. (42 U.S.C. § 9910, as amended)

6.2.2 Members of boards of directors have legal obligations as follows:

A. Duty of Care – The duty of care describes the level of competence that is expected of a

board member and is commonly expressed as the duty of “care that an ordinarily prudent person would exercise in a like position and under similar circumstances.” A board member must exercise reasonable care when he or she makes a decision as a steward of the organization.

- B. Duty of Loyalty – Board members owe the organization their undivided allegiance when making decisions. This means that a board member can never use information obtained as a result of board membership for personal gain.
- C. Duty of Obedience – The duty of obedience requires board members to be faithful to the organization’s mission. They are not permitted to act in a way that is inconsistent with the central goals of the organization.

(Extracted from Legal Requirements Governing Tripartite Boards, CAPLAW)

6.2.3 Basic responsibilities of effective non-profit boards: *

- A. Determine the organization’s mission and purpose.
- B. Selection of the executive.
- C. Support the executive and review his or her performance.
- D. Ensure effective organizational planning.
- E. Ensure adequate resources.
- F. Manage resources effectively.
- G. Determine and monitor the organization’s programs and services.
- H. Enhance the organization’s public image.
- I. Serve as a court of appeal.
- J. Assess its own performance.

*(Extracted from The Training and Orientation Tool for NonProfit CAA Tripartite Boards, CAPLAW)

1. Additional information on the duties and responsibilities of a tripartite board can be found on the CAPLAW website.

6.2.4 The governing board of each private, non-profit eligible entity must undertake an annual

performance evaluation of the entity's Executive Director/CEO. This evaluation must include a statement of outcomes for which the executive is responsible and must provide a progress statement relative to the achievement of those outcomes. Dated evidence of the evaluation must be contained within the Executive Director/CEO's personnel file.

A. Organizational Standard 7.4 for private entities states, "The governing board conducts a performance appraisal of the Executive Director/CEO within each calendar year."

6.2.5 A succession plan must be in place for the Executive Director/CEO, which contains procedures for covering an emergency/unplanned, short-term absence of 3 months or less, as well as the process for filling a permanent vacancy. Board approval of the plan is required of private, non-profit Community Action Agencies. (Organizational Standard 4.5)

A. The plan should direct that the names of candidates for the position of CEO/Executive Director be checked against the Federal government's "Excluded Parties List System" online database to be sure that they are not suspended or disbarred from participating in Federal grant or contract programs.

6.2.6 The board must be aware of CSBG's role within the organization and must receive all pertinent information related to CSBG grant operations, monitoring and reporting.

6.2.7 The governing board or the administering board, as applicable, must be immediately informed of any sanctions or disciplinary action that DSS takes against the entity.

6.2.8 Any decision, policy change or action by the board which would result in a change in program scope or in the approved line item budget, beyond the allowable variance, must be reported to DSS within 10 days of the board action. Examples of such policy changes or actions include (but are not limited to) addition or deletion of programs or staff positions supported wholly or partly with CSBG funds. This requirement is independent of, and in addition to, the requirements contained within Section 5.3.

6.3 BYLAWS' REQUIREMENTS

6.3.1 The governing board must develop and approve bylaws by which the board shall operate, and which meet, at minimum, the requirements stated herein.

A. The Community Action Agency must comply with the Board-approved bylaws that govern the CAA.

6.3.2 Each Community Action Agency must, on the submission of the annual refunding application, ensure that DSS is in possession of a current, dated copy of the entity's

bylaws.

- A. The Community Action Agency must notify DSS electronically of any changes to the bylaws within thirty (30) days following the change approved by the agency's Board.

6.3.3. The bylaws must list the total number of seats on the board and the allotment of seats to public officials, low-income sector representatives and private sector representatives.

- A. The Community Action Agency must notify DSS electronically of any changes to the composition of the Board within thirty (30) days following the change approved by the agency's board

6.3.4 The bylaws must define a term not to exceed three years for each member position. Term limits, if desired, may be expressed as multiples of a term.

6.3.5 The bylaws must include procedures for the selection of board members.

- A. Procedures for the selection of representatives of low-income persons must demonstrate an aspiration that all areas of the low-income community be represented.
- B. Selection procedures for low-income sector representatives, if by vote, must include safeguards to limit voting to low-income adults who reside in the area served, with one vote per person.

6.3.6 The bylaws must require that the board elect (i.e. vote to seat) all members, no matter which selection method is used to identify prospective members.

6.3.7 The bylaws must describe any performance standards (such as attendance, etc.) and standards of conduct for members of the board, the violation of which may be grounds for removal.

6.3.8 The bylaws must describe specific procedures to be followed for the board to remove any director or officer for cause.

6.3.9 The bylaws must include procedures for selecting new board members in the case of a vacancy on the board and must prescribe that those procedures must commence within 30 days of the occurrence of the vacancy. For the purpose of this paragraph, a vacancy occurs when a member has been notified of his or her official removal by the board, a member submits his or her resignation, a member dies, a member who is an elected public official leaves office, a member who is an appointed public official is removed from office or a member is the representative of a public official and the public official leaves office.

6.3.10 Vacant board seats must be filled within one hundred twenty (120) days of the seat becoming vacant. For the purpose of this paragraph, a vacant seat is filled when the board votes to seat the new board member.

- A. Board seats that are vacant for more than one hundred twenty (120) days may be considered a compliance issue and may result in the Community Action Agency being placed on a Quality Improvement Plan to fill the vacancy.
- B. If extenuating circumstances exist that prevent the vacant seat being filled within the one hundred twenty (120) day timeframe, agencies may request an extension electronically from DSS. The extension must include the following information.
 - 1. A description of the circumstance(s) that has or will cause the Board seat to be vacant more than one hundred twenty (120) days;
 - 2. A recruitment plan for filling the vacant Board seat; and
 - 3. The anticipated time frame to appoint an individual to fill the vacant Board seat.
- C. DSS shall approve, in writing, all reasonable requests for extenuating circumstances to fill a vacant seat, except that under no circumstance shall a Board seat remain vacant for a period of time that exceeds three hundred sixty-five (365) days.

6.3.11 With respect to low-income sector representatives, the bylaws must include a method for filling a vacancy that demonstrates the involvement of low-income individuals. The selection procedure may be repeated, or alternately, the remaining low-income representatives may recommend a replacement to serve for the remainder of the term. In the latter case, the person selected must, to the maximum extent possible, represent the same constituency as the original representative.

- A. Members filling a low-income sector vacancy must stand for democratic selection for any subsequent term in order to remain in that position.

6.3.12 Should the seat of a representative of a public official become vacant, the board must request that the public official, or appointing authority, name a replacement.

6.3.13 Should the seat of a representative of the private sector become vacant, the board may reflect on its skill set needs and recruit accordingly. A board development committee, or equivalent, may be tasked with recommending a candidate for board approval.

6.3.14 The board must be advised of progress in filling a vacancy at each subsequent meeting until such time as the vacancy is filled.

6.3.15 The agency bylaws must set the quorum for a meeting of the board. Quorum must be at least 51 percent of the non- vacant seats on the board. A quorum must be present for all decisions requiring a vote.

6.3.16 The agency bylaws must specify that the board meet on a regular basis. At a minimum, the board must meet six times annually. The eligible entity must submit Board meeting notices, meeting agendas, and all other information provided to the Board (i.e. Board packets) at least three (3) business days prior to the scheduled Board meeting electronically in the Organizational Standards Assessment System

A. Upon submission of Board documents in the Organizational Standards Assessment System, the agency shall notify DSS electronically.

6.3.17 The bylaws may define and empower an executive committee, drawn from the entity's board members, to transact business for the full board. The executive committee must provide a written report of its actions at the next meeting of the full board. The quorum for the executive committee may not be less than 51 percent of the non-vacant seats on the committee.

6.3.18 Voting by proxy is not permitted at meetings of the board or of its committees. This prohibition applies to all members of the board.

6.3.19 Procedures must be established within bylaws under which a low-income individual, community organization or religious organization or representatives of low-income individuals that considers its organization or low-income individuals to be inadequately represented on the board of the eligible entity, may petition for adequate representation.

6.4 ALLOWABLE COSTS

6.4.1 The allowable board costs include:

- A. Reasonable and actual expenditures incurred solely as a result of attending a scheduled board meeting or a meeting of an appointed committee of the board.
- B. The reasonable costs of necessary meals furnished by the eligible entity for participants in scheduled meetings. Such costs are allowable only if the board members are not reimbursed – as per diem or otherwise.

6.5 GENERAL

6.5.1 Community Action Agencies must have a documented process that ensures initial and continued board training to include, as applicable: non-profit board responsibilities (within the past 2 years) including fiduciary responsibilities, results oriented management and accountability (ROMA), program and service information, the causes and effects of poverty, emerging issues and the origin, source and impact of CSBG funding. (Organizational Standard 5.8)

6.5.2 Meetings of the governing board are subject to the Missouri Sunshine Law, as applicable, and Community Action Agencies shall comply with the requirements therein as they relate to meetings of the agency's governing board and providing access to public records. (RSMo Chapter 610, Government Bodies and Records)

6.5.3 The board must keep written minutes for each meeting. Open meeting Minutes must be made available to the public upon request.

6.5.4 The Community Action Agency shall submit to DSS, electronically, copies of the approved minutes for each meeting of the governing board, along with the respective financial report received by the board, in the Organizational Standards Assessment System no later than thirty (30) days after the date of approval.

A. Organizational Standard 8.7 requires that the governing board of private entities receive financial reports at each regular meeting that include the following:

1. Organization-wide report on revenue and expenditures that compares budget to actual, categorized by program; and
2. Balance sheet/statement of financial position.

B. Approved minutes submitted to DSS must be signed by the Board Chair (or designee as approved by the bylaws of the agency) and must include the date of the meeting at which the minutes were approved.

C. Upon submission of Board documents in the Organizational Standards Assessment System, the agency shall notify DSS electronically.

SECTION 7 – PLANNING

7.1 COMMUNITY ASSESSMENT

7.1.1 As required by the Coats Human Services Reauthorization Act of 1998 and as a condition of funding, Community Action Agencies must produce and maintain a community needs assessment.

7.1.2 A full community assessment must be completed, and a report issued, at a minimum, once every three years (Organizational Standard 3.1); updates addressing significant variances must be provided in intervening years. The full assessment must include elements identified within Organizational Standards including:

- A. A statistical profile (i.e. charts, graphs, maps) including current data specific to poverty and its prevalence related to gender, age, and race/ethnicity for their service area(s). (Organizational Standard 3.2)
- B. Both qualitative and quantitative data on the geographic service area(s) which may include community perspectives (common themes, key quotes, . . .). (Organizational Standard 3.3)
- C. Key findings on the causes and conditions of poverty and the needs of the communities assessed. (Organizational Standard 3.4)
- D. Customer satisfaction data and customer input. (Organizational Standard 6.4)

7.1.3 Legislation allows that the assessment may be coordinated with community assessments conducted for other programs. An assessment so conducted must contain all elements listed in Item 7.1.2; it must address the entire service area and be clearly applicable to the work of the eligible entity.

7.1.4 Community Action Agencies must, on the submission of the annual application, ensure that DSS is in possession of a current, dated copy of the community assessment. An update, detailing significant variances, if any, must be provided in intervening years.

7.1.5 The Community Needs Assessment must be published within the three-year period.

7.2 STRATEGIC PLAN

7.2.1 Each eligible entity must have a strategic plan in place that has been approved by the governing board within the past three years (Organizational Standard 6.1).

- A. The Community Action Agency shall electronically submit a Board-approved comprehensive Strategic Plan to DSS by September 30, 2021, in the Organizational Standards Assessment System.
- B. The plan must meet the following minimum specifications:
 - 1. The strategic plan must be drawn from the findings contained within the community needs assessment.
 - 2. The strategic plan must clearly define the period of time covered by the plan.
 - 3. The strategic plan must contain a mission statement succinctly defining the reason the organization exists.
 - 4. The plan may contain a vision statement which succinctly defines the desired future the entity envisions. The entity may wish to include a vision for individuals and families, the community and the agency.
 - 5. The plan may include a list of core values. Core values are the absolutes that define the organization. Values give an organization its soul. They can clarify and resolve issues, help determine direction, and build community.
 - 6. The plan must contain family, agency and/or community goals. (Organizational Standard 6.3) Goals are those overarching and broad statements of what the organization hopes to achieve.
 - 7. The plan must identify strategies. Strategies are statements of major approaches that will be used to achieve each goal. Three to five strategies for each goal may be adequate.
 - 8. The plan must include initiatives. Initiatives are specific programs, projects or activities planned to occur over the course of the planning cycle to advance each strategy.
 - 9. The plan must contain a process for evaluating elements within the plan.

7.2.2 Community Action Plan / Logic Models that identify the targeted tasks involved in

operationalizing the strategies/initiatives contained within the strategic plan are a suggested tool for moving the organization toward its goals.

7.2.3 The governing board must receive, at a minimum, an annual update on progress in meeting the goals of the strategic plan. (Organizational Standard 6.5)

7.2.4 Community Action Agencies must, on the submission of the annual application, ensure that DSS is in possession of a current, dated copy of the board-approved strategic plan.

7.3 CALENDAR OF PLANNING ACTIVITIES

7.3.1 DSS provides a Key Dates for CSBG Activities document, as well as a CSBG Calendar spreadsheet to agencies for planning purposes. Similarly, each agency must establish and maintain a calendar of activities which will ensure that the governing board:

- A. Reviews the entity's accomplishments and the strategic plan at a minimum, annually.
- B. Annually reviews its bylaws and membership needs.
- C. Annually reviews the entity's fiscal policy and procedures (alternately, administering boards may review fiscal reporting practices).
- D. Annually reviews the entity's personnel policy (administering boards exempt).
- E. Annually reviews recurring grant applications including the CSBG application.
- F. Annually conducts an evaluation of the entity's Executive Director/CEO per Item 6.2.4 and annually reviews and approves Executive Director/CEO compensation. (Organizational Standards 7.4 and 7.5)
- G. Receives and reviews an organization-wide, comprehensive risk assessment at minimum once every two years. (Organizational Standard 4.6)
- H. Addresses other time sensitive CSBG Organizational Standards and entity processes.
- I. Receives training on their duties and responsibilities at a minimum of once every other year.
- J. Receives an overview of ROMA training for board members and staff.

SECTION 8 – SERVICE DELIVERY

8.1 GENERAL

8.1.1 Missouri Community Action Agencies shall use funding to provide services to eligible participants in accordance with federal regulations.

- A. Agencies shall provide the services identified in Attachment 1 to eligible participants of the geographic area served by the agency.
- B. Agencies shall not charge fees or accept donations or contributions from any eligible participant for delivery of any CSBG-funded services identified in Attachment 1.

8.1.2 Missouri Community Action Agencies must develop and implement written standards of operation, including program policies and procedures, to govern programs operated in whole or part with CSBG funds.

- A. Community Action Agencies must ensure that DSS is provided a current, dated copy of the approved program policies and procedures within 30 days of being implemented.

8.1.3 Program policies and procedures must include:

- A. Procedures for emergency/one-time assistance programs
- B. Procedures for case management programs
- C. Intake procedures, including instructions for using the entity's intake and application documents.
- D. Eligibility criteria, including:
 - 1. Income verification period
 - 2. Income guidelines and criteria
 - 3. Eligibility period
 - 4. Residency verification procedures and criteria.

- E. Procedures for recertification of eligibility.
- F. A definition of household in accordance with a prevailing definition. (e.g. 45 CFR § 1305.2)
- G. Safeguards to ensure that eligible entity staff or staff members' families do not realize an undue advantage as they seek services.
- H. A process to identify and inform custodial parents in single-parent families that participate in programs, activities or services carried out or provided through CSBG about the availability of child support services and to refer eligible parents to the child support offices of State and local governments.
- I. For those activities and services for which eligible applicants exceed capacity, a process for prioritizing applicants and for notifying applicants of their status.
- J. A statement indicating 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 funds made available through CSBG. Any prohibition against discrimination on the basis of age under the Age Discrimination Act of 1975 (42 USC 6101 et seq.) or with respect to an otherwise qualified individual with a disability as provided in Section 504 of the Rehabilitation Act of 1973 (29 USC 794), or title II of the Americans with Disabilities Act of 1990 (42 USC 12131 et seq.) shall also apply to any such program or activity. (42 USC 9918 et seq.)
- K. An appeal procedure which includes a process through which applicants for service are made aware of their right to appeal a decision related to their determination of eligibility and addressing claims of discrimination.
 - 1. The policy shall be sufficient to ensure the agency acts on grievances objectively, promptly, and consistently. The policy shall be posted for public view in all agency facilities.
 - 2. The agency shall provide a copy of each client grievance electronically to DSS within three (3) business days of receipt.
 - 3. The agency shall provide written notice to the client of the final disposition of the grievance, and shall provide notice to DSS electronically of the final disposition of the grievance within three (3) business days.

8.1.4 Material aid provided, and programs operated solely with CSBG funds must follow poverty guidelines established annually by the Federal Office of Management and Budget

(OMB) when qualifying customers. Customers whose family income, indexed for size, is at or below 125 percent of the poverty guideline, by Federal law, qualify for such services.

- A. A categorical determination of eligibility may be acceptable if evidence of eligibility for a companion program demonstrates family income, indexed for size, is at or below 125 percent of the poverty guideline.

8.1.5 Each eligible entity must establish criteria for verification of household income, which must be used uniformly among all CSBG programming.

- A. The income period and verification procedures used to determine eligibility must be clearly defined within the written program policies and procedures.
- B. The intake worker must verify income as established within the program policies and procedures.
- C. Household income means total cash receipts before taxes from all sources, with the exceptions noted below. Income includes money wages or salary before deductions; net income from non-farm self-employment; net income from farm self-employment; regular payments from Social Security or railroad retirement; payments from unemployment compensation, strike benefits from union funds, workers' compensation, veterans benefits (with the exception noted below), public assistance (including Temporary Assistance for Needy Families, Supplemental Security Income, Emergency Assistance money payments, and non-Federally funded General Assistance or General Relief money payments); training stipends; alimony, child support, and military family allotments or other regular support from an absent family member or someone not living in the household; private pensions, government employee pensions (including military retirement pay), and regular insurance or annuity payments; college or university scholarships, grants, fellowships, and assistantships; and dividends, interest, net rental income, net royalties, and periodic receipts from estates or trusts; and net gambling or lottery winnings for all family members living in the household (non-relatives, such as housemates, are not included). It is calculated without consideration of taxes paid or anticipated.
- D. For purposes of CSBG income verification, household income does not include capital gains; any assets drawn down as withdrawals from a bank, the sale of property, a house or a car; or tax refunds, gifts, loans, lump-sum inheritances, one-time insurance payments, or compensation for injury. Also excluded are noncash benefits, such as the employer- paid or union-paid portion of health insurance or other employee fringe benefits; food or housing received in lieu of wages; the value of food and fuel produced and consumed on farms; the imputed value of rent from owner-occupied non-farm or

farm housing; and such Federal non-cash benefit programs as Medicare, Medicaid, food stamps, school lunches, and housing assistance, and certain disability payments made to disabled children of Vietnam veterans as prescribed by the Secretary of Veterans Affairs.

- E. In determining household income, self-declaration of income must be used only as a method of last resort. The signature of the applicant must appear on a self-declaration statement.

8.1.6 The poverty guideline is not a consideration when non-consumer-specific, community development activities are undertaken to alleviate the causes and effects of poverty.

8.1.7 Should CSBG funded staff, through collaborative agreements entered into with a primary purpose to alleviate the causes and effects of poverty, have access to material aid that is distributed using a funder-defined income guideline different from that required of CSBG, the funder's income guideline must prevail.

8.1.8 When case management activities, and other non-material aid, are funded by multiple funding streams, a pro rata share of cases qualifying at the 125 percent level must be equivalent to, or greater than, the percent of CSBG funding supporting the activities.

8.1.9 Applicant intake documents must be uniform among all of the agency's centers and must solicit, at a minimum, the following information:

- A. Date of application.
- B. Applicant name and address and all household members – name, gender, date of birth, disability status, health insurance status, education level (for family members whose age is equal to or greater than 24), family size, income and income types (source) for all household earners, family type, housing type, ethnicity and race.
- C. Applicant's signature.
- D. An identification of the intake worker.

8.1.10 Consumer files need not contain copies of documents used to certify income. If such documentation is not included in the file, the file must contain a statement detailing those documents observed and how the family income was calculated. The statement must be signed by the person evaluating the income. When an applicant is deemed ineligible, a statement must include reason(s) for ineligibility.

8.1.11 The entity must verify that the applicant is a resident of the State of Missouri. Services funded in whole or in part by Missouri CSBG funds or provided by CSBG funded staff must

not be provided to individuals who are not residents of the State of Missouri.

- A. Consumer files need not contain copies of documents used to determine residency. If such documentation is not included in the file, the file must contain a statement demonstrating how residency was determined.

8.1.12 Applications for CSBG services can be accepted only from adults (18 years or older) or emancipated minors. It is noted that children receiving foster care services represent a household of one for the purpose of eligibility determination. In some cases, it might be appropriate to list the foster child as the applicant; entity policy will prevail.

8.1.13 The period for which a consumer is eligible for CSBG funded services and material aid must be defined in the eligible entity's written procedures and must be uniformly applied at all centers and service points.

- A. In lieu of a published definition of "eligibility period," the eligibility period must be the same length as the period used for income verification.

8.1.14 A statement of eligibility recertification must be completed at the time of the first service request following expiration of the previous eligibility period. All requirements applicable to eligibility certification, including income verification, apply to recertification. The criteria established by the eligible entity for income verification must be used for income recertification. Other pertinent information (such as household size, address, etc.) should be updated, as applicable.

8.1.15 A record of service provision must be included in the service record of each eligible applicant. This record must include the initial date of service and the services provided, as well as the date and services provided for each succeeding service contact. Records of service provision may be maintained electronically, if the entity agency is able to maintain separate records on each program participant.

8.1.16 Services provided for applicants who are determined to be ineligible are restricted to information and referral.

SECTION 9 – FISCAL POLICIES AND PROCEDURES

9.1 GENERAL

9.1.1 Entities expending CSBG resources must be guided by 45 CFR Part 75 – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for HHS Awards unless a more stringent practice is required by DSS.

9.1.2 Each Community Action Agency must maintain a fiscal operations manual that details all fiscal policies and procedures for the entity, including maintenance of records, procedures for disbursement, maintenance of property records, procurement procedures and all other relevant policies and procedures.

A. Community Action Agencies must, on the submission of the annual RFP, ensure that DSS is in possession of a current, dated copy of the approved fiscal policies.

9.1.3 As a condition for receipt of CSBG funds, Community Action Agencies must have a financial management system that meets the following standards prescribed by the Federal OMB, including:

A. Each entity must be able to make accurate, current and complete disclosure of each CSBG award.

B. Each entity must maintain records that adequately identify the source and application of funds for each CSBG award.

C. Each entity must maintain effective control over and accountability for all funds, property and other assets and must adequately safeguard all such assets and must assure that they are used solely for authorized purposes.

D. Each entity must have established, written procedures for determining the reasonability, allowability, and allocability of costs in accordance with the provisions of the applicable cost principles and the terms of its contracts.

E. Each entity must make comparison of actual outlays with budget amounts for each grant or other agreement.

F. Each entity must maintain accounting records that are supported by source documentation.

9.1.4 Each entity must provide assurances that any organization to which CSBG funds are

sublet has a financial system which meets the standards identified in Item 9.1.3.

9.2 GRANT PAYMENT PROCESS

This section prescribes procedures for summarizing expenditures made and grant funds unexpended for each CSBG award, reporting the status of grant cash received, and requesting reimbursements and advances.

9.2.1 Payments to Community Action Agencies for grants funded with the 90 percent pass-through funds will generally be made on a reimbursement basis.

9.2.2 Agencies shall report CSBG expenditures and request a grant payment by submitting a properly itemized invoice electronically to CSU.Invoices@dss.mo.gov by the 10th day of the month for the actual expenditures incurred in the previous month, unless extenuating circumstances exist.

- A. Prior to the 10th day of the month, should extenuating circumstances exist which prevent the agency from submitting the invoice timely, the agency shall submit a written request to DSS explaining the circumstances and providing the date when the invoice will be presented for payment. Reasonable requests for acceptance of late invoicing will be granted, in writing and at the discretion of DSS.
- B. Payments will typically be in the amount requested.
- C. Payments will be processed to arrive on or near the first day of the month.

9.2.3 The Itemized CSBG Invoice must:

- A. Contain an accurate, current, and complete disclosure of the financial results related to the identified CSBG grant.
- B. Contain the original signature of the Executive Director/CEO or other individual identified by the eligible entity as an authorized signatory on the Authorized Signatories form submitted annually to DSS.
 - 1. Fiscal staff will not be recognized as an authorized signatory for this purpose.
 - 2. The authorized signatories list retained by DSS may be amended or revised as needed through the attestation of the Executive Director/CEO and the chair of the governing board.

- C. Be submitted for each month during which funds are obligated or expended.
- D. Be submitted electronically to W&CI.INVOICES@dss.mo.gov by no later than the 10th day of the month following the month for which the report has been prepared.

9.2.4 Revised Itemized CSBG Invoices may be submitted, as needed and with explanation, prior to the submission of the “FINAL” report.

9.2.5 Each agency must retain a copy of submitted Itemized CSBG Invoices. Worksheets and/or ledgers which support the information contained within the report must be attached to the entity’s copy.

9.2.6 Entities will be contacted if reports contain errors or insufficient information. Those impacted may be required to submit corrected reports within three (3) business days. Changes to correct obvious errors will be allowed on verbal agreement made between the entity’s representative and DSS staff. Such changes shall be noted on the DSS copy by staff. This notation shall be initialed and dated. Should a subsequent disagreement occur regarding Itemized CSBG Invoices so altered, the entity must be required to submit, for DSS consideration, a revised Itemized CSBG Invoice for the affected period.

9.2.7 Itemized CSBG Invoices which are late or require correction or additional information may delay the processing of payments. In the event that a report is late or inaccurate, payment may be delayed until the following month’s payment cycle.

9.2.8 DSS may, at its discretion, respond to an off-cycle payment request.

9.2.9 At the point that all funds for a particular award have been received, receipted, and expended, the entity must submit a clearly identified “FINAL” Itemized CSBG Invoice to DSS. The final report must contain all expenditures and receipts for the grant period.

- A. Final reports on non-discretionary CSBG awards will be due 60 days after the end of the grant period.

9.2.10 As part of its closeout of the grant and based upon final reports and its own accounting, DSS will determine the final payment, if any, due the entity or repayment amount, if any, due DSS. Results of this closeout review will be delivered to the respective entity.

9.3 EXPENDITURES

9.3.1 Expenditures must be in accordance with the approved budget, except when allowable variances are applicable.

- A. Receipt of payment does not constitute validation of expenditures; they remain subject to verification procedures stated herein.
- B. At the request of DSS, the agency shall produce and make available all records necessary for expenditure verification.

9.3.2 DSS shall have the right to recover from the agency all funds for which adequate verification and full documentation of expenditures is not maintained. Adequate verification and full documentation shall be defined as maintaining records in such a manner that an orderly examination by a reasonable person:

- A. Is possible;
- B. Can be conducted without the use of information extrinsic to the existing records;
- C. Can readily determine whether the goods or services were in fact provided, and;
- D. Can readily determine whether the goods or services were provided in accordance with the terms of the agency's contract and application of federal and state regulations.

9.3.3 If an eligible entity expends grant funds contrary to the provisions of the grant award, such action shall require the repayment of those funds if the expenditure violated statutory provisions. DSS may require repayment of expenditures that do not conform to the provisions of the grant award even if the expenditures are determined allowable by statutory provisions.

9.3.4 Community Action Agencies must not give CSBG-funded staff raises/incentive pay from CSBG funds after the entity's CSBG budget has been approved unless such raises are in keeping with the entity's policy on salary increases. CSBG funds may only be used to pay for the pro rata share of vacation leave, sick leave, retirement, and other fringe benefits of CSBG funded positions.

9.3.5 Community Action Agencies must reimburse staff and volunteers for travel at uniform rates and in accordance with the entity's written procedures. No staff member or volunteer shall be paid a higher reimbursement rate than any other staff member or volunteer.

9.3.6 Procurements made in whole or part with CSBG funds are to be made in accordance with 45 CFR Part 75 – Uniform Administrative Requirements, Cost Principles and Audit

Requirements for HHS Awards.

9.3.7 Where an eligible entity proposes to enter into a sole source contract or a contract where only one bid or proposal is received, such contract shall be subject to prior approval by DSS if the aggregate expenditure for all items to be procured from the bidder/offeror will exceed \$3,000 in a 12-month period. The eligible entity may submit the request for approval to DSS by mail or email. DSS will respond to the request within 60 days.

9.3.8 All consulting contracts to be funded, in whole or in part, with CSBG funds must receive prior approval from DSS. The request for approval must be in writing, and must include:

- A. The need expected to be met by hiring a consultant.
- B. The name and address of the individual(s) to be hired.
- C. The resumé of the consultant(s) to be hired.
- D. A description of the work to be conducted by the consultant including deliverables.

9.3.9 Expenditures proposed for consulting contracts and submitted with the eligible entity's budget require the detail identified in Item 9.3.8.

9.3.10 An entity wishing to subcontract or delegate any part of its CSBG grant for service activity must receive prior approval from DSS. Subcontracted activity is bound by State and Federal requirements.

9.3.11 A contract award (see 2 CFR 180.220) must not be made to parties listed on the government wide Excluded Parties List System in the System for Award Management (SAM), in accordance with the OMB guidelines at 2 CFR 180 that implement Executive Orders 12549 (3 CFR Part 1986 Comp., p. 189) and 12689 (3 CFR Part 1989 Comp., p. 235), "Debarment and Suspension." SAM is the Official U.S. Government system that consolidated the capabilities of CCR/FedReg, ORCA, and EPLS.

- E. Evidence supporting the contractor's eligibility to enter a contract must be maintained by the contracting agency.

9.3.12 DSS may require the contractor to enter into a security agreement or similar instrument, to be provided by DSS, granting DSS a secured interest in any personal property purchased with the grant funds.

9.4 PROPERTY MANAGEMENT

9.4.1 CSBG funds may not be used 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.

9.4.2 Community Action Agencies must adhere to the following inventory procedures:

- A. Each eligible entity must maintain a dated inventory listing of all property with a unit cost of \$5,000 or more purchased in whole or part with CSBG funds. The listing must include those elements prescribed by 45 CFR Part 75 – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for HHS Awards.
- B. Community Action Agencies must take a physical inventory of equipment and reconcile the results with the equipment records in accordance with the requirements of 45 CFR Part 75 – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for HHS Awards.

9.4.3 Community Action Agencies must, on submission of the annual RFP, ensure that DSS is in possession of the current, dated inventory listing showing all property with a unit cost of \$5,000 or more, purchased in whole or in part with CSBG funds.

9.4.4 When property purchased with CSBG funds is no longer needed for the approved project, the eligible entity must request disposition instructions from DSS or permission to use that property in other programs consistent with CSBG purposes. This provision applies to property having a current, fair market value of \$5,000 or more per unit. The eligible entity may submit the request for approval to DSS by email. DSS will respond to the request within 60 days.

9.5 BONDING AND INSURANCE

9.5.1 Community Action Agencies must procure fidelity bonding or other protection covering those who are authorized to sign checks, certify vouchers and/or handle or control funds (beyond petty cash), checks, securities, or property. The amount of the bond/coverage required must be adequate to insure the security of CSBG funds or the maximum amount held in bank accounts at any one time, whichever is higher.

9.5.2 Each eligible entity must maintain documentation assuring that the condition described in Item 9.5.1 has been met. This assurance may take the form of a letter from a bonding company or agent stating the type of bond, amount and period of coverage, positions covered and the annual cost of the bond that has been obtained.

9.5.3 Community Action Agencies are responsible for assuring that delegate agencies receiving CSBG funds meet the terms of this bonding coverage requirement.

9.5.4 Community Action Agencies must maintain appropriate liability insurance which should include, at a minimum, directors and officer's insurance, volunteer and special event insurance, employment practices liability and general liability.

- A. Insurance deductible amounts should not exceed the eligible entity's unrestricted, reserve funds.

9.6 RETENTION OF RECORDS

9.6.1 Financial records, supporting documents, statistical records and all other records, in whatever format, pertinent to a CSBG award must be retained for a period of five years from the date of submission of the final expenditure report.

9.6.2 If any litigation, claim, or audit is started before the expiration of the three-year period, the records must be retained until all litigation, claims, or audit findings involving the records have been resolved and final action taken. (45 CFR § 75.361)

9.7 AUDITS

9.7.1 Entities receiving \$750,000 or more in Federal funding during fiscal years beginning after December 26, 2014 must be audited annually using OMB- defined methodology.

- A. Entities that sublet CSBG funds must ensure that entities to which funds are sublet and who receive \$750,000 or more in Federal funding during fiscal years beginning after December 26, 2014 are audited annually using OMB-defined methodology.
- B. Under certain circumstances, DSS may require agencies receiving under \$750,000 in Federal funding to have an audit of their financial statements completed.

9.7.2 Community Action Agencies and subrecipients must allow auditors and State and Federal personnel to have access to records and financial statements as necessary to comply with audit and monitoring responsibilities.

9.7.3 Community Action Agencies shall provide the following electronically to DSS at: DFAS.Compliance@dss.mo.gov

- A. Annual audit report

- B. An audited CSBG supplemental schedule, and supplemental schedule disclosure for the CSBG Program Year
- C. Any management letter issued by the auditor
- D. A copy of the Federal Form 990

9.7.4 DSS's Finance Division issues applicable DSS management decisions following its review of the Audit Clearinghouse submissions.

9.7.5 Each entity must have in place a systematic method to assure timely and appropriate resolution of audit findings and recommendations.

9.8 EFT

9.8.1 Missouri Community Action agencies shall understand and agree that DSS reserves the right to make payments to the agencies through electronic funds transfer (EFT). Therefore, prior to any payments becoming due, the agency shall return a completed State Vendor ACH/EFT application. The State Vendor ACH/EFT application can be downloaded from the internet at: <https://www.vendorservices.mo.gov/vendorservices/Portal/Default.aspx>

SECTION 10 – PERSONNEL POLICIES AND PROCEDURES

10.1 GENERAL

10.1.1 To provide for the consistent and equitable treatment of employees and to ensure that all such employees fully understand the terms and conditions of their employment, each Missouri Community Action Agency must issue published policies which include:

- A. Agency rules governing vacations, sick leave, periodic salary increases and other conditions of employment.
- B. A description of any benefit plans with details on agency and employee contributions to those plans.
- C. Any rules governing promotion, separation, resolution of grievances and employee conduct.
- D. A whistleblower policy responsive to the requirements of the Sarbanes-Oxley Act.

10.1.2 Community Action Agencies must, on submission of the annual Request for Proposal, ensure that DSS is in possession of a current, dated copy of the approved personnel policies.

10.1.3 Community Action Agencies must adhere to the following standards governing the selection of personnel for employment in CSBG supported programs:

- A. Employment of persons who can perform their duties with competence.
- B. Consideration must be given to providing employment opportunities to qualified, low-income persons.
- C. No entity shall discriminate in its hiring and personnel procedures against any applicant for employment or any employee because of race, creed, color, national origin, religion, handicap, gender or age.

10.1.4 Community Action Agencies must adhere to the following practices:

- A. The salary and benefits for each position must be in accordance with prevailing practice in comparable local public or private nonprofit agencies.
 - 1. The agency shall comply with the Consolidated Appropriations Act, 2012 (Public Law 112-74), enacted December 23, 2011, that limits the salary amount

that may be awarded and charged to the U.S. Department of Health and Human Services (HHS), Administration for Children and Families (ACF) grants and cooperative agreements. Award funds issued under an DSS contract may not be used to pay the salary, or any percentage of salary, to an individual at a rate in excess of Executive Level II. This amount reflects the individual's base salary exclusive of fringe and any income that an individual may be permitted to earn outside of the duties to the agency organization. The Executive Level II salary of the Federal Executive Pay Scale can be found at:

<http://www.opm.gov/oca/12tables/html/ex.asp>

- B. Agencies must maintain evidence of efforts to ensure salary and benefits are in accordance with prevailing practice.
- C. An agency may provide a plan for DSS review and acceptance should it desire an alternate approach to 10.1.4B for meeting the internal control requirements appropriate to compensation for personnel services (45 CFR § 75.430).
- D. Community Action Agencies must have an established employee grievance procedure. Employee grievances must be given prompt and fair consideration. Agencies must make provision for review of personnel actions by the Executive Director / CEO in any case in which there is a claim of unfair treatment or of dismissal without cause.

10.1.5 Individual personnel files must, at a minimum, contain the following records on each employee:

- A. Documentation of all personnel actions including hiring, termination, promotion and discipline.
- B. Records of the salary and any salary increase received by each full- time and part-time employee.

10.1.6 Community Action Agencies must maintain an employee-signed and dated job description, indicating current tasks for which the employee is held accountable. Organizational Standard 7.3 requires private entities to have job descriptions which have been updated within the past five years.

10.1.7 Private non-profit entities must maintain on file an attestation that each employee has received and reviewed the Community Action Code of Ethics at: <https://communityactionpartnership.com/code-of-ethics-2/>. Public entities must maintain on file an attestation that each employee within the CSBG operational unit has received and reviewed the Community Action Code of Ethics.

10.1.8 No person shall hold a position of employment over which a family member exercises supervisory authority.

10.1.9 Within fifteen (15) days of the occurrence or the notification of resignation (whichever may be earlier), the agency must advise DSS in writing of the voluntary or involuntary termination or the hire of key leadership to include, at a minimum, the following positions:

- A. Executive Director/CEO
- B. Fiscal Officer
- C. Community Services Director
- D. Personnel Officer/HR Director
- E. IT Director
- F. ROMA Professional

10.1.10 Community Action Agencies must provide a written professional development plan for newly hired or newly appointed key CSBG leadership including, at a minimum, those positions identified in Item 10.1.9 (A-F). This plan must take into account the employee's previous training and experience. The plan must include a meeting with DSS staff if applicable and, as relevant, may include statewide and national conferences such as the Community Action Partnership (CAP) Convention, CAP Management Intensives, CAPLAW events, the Missouri Community Action Network Conference, and Wipfli trainings. The plan may also include the pursuit of the Certified Community Action Professional (CCAP) credential and/or certification as a ROMA professional.

10.2 CODE OF ETHICS

10.2.1 Community Action Agencies must develop written policies which observe the following minimum standards governing the conduct of board members, employees and their immediate families:

- A. Board members, employees and members of their immediate families must not solicit or accept gifts, gratuities, or favors of a monetary value which exceed State of Missouri Governmental Ethics threshold and courtesy meals which exceed State of Missouri Governmental Ethics threshold in accordance with Missouri governmental ethics laws and specifically from:
 - 1. Any contractor, potential contractor or subcontractor of the agency,
 - 2. Any person applying for or receiving benefits or services through or from the

agency and,

3. Any person in a position to benefit otherwise from the activities of the agency.
- B. Any board member, employee or member of his or her family having a financial interest in a contract with the agency which is supported by CSBG funds must make complete disclosure of such interest to a responsible and objective agency official.
 - C. A board member or employee of an agency must refrain from all participation in any matter involving CSBG funds which affects, to his or her knowledge, the financial interest of:
 1. His or her business partner(s) or a business organization with which he or she is associated.
 2. Any person or organization with whom he or she is negotiating or has any arrangement concerning prospective employment.

10.2.2 Board members and employees of Community Action Agencies must refrain from conduct which violates any of the above standards or gives the appearance of violating the standards.

10.3 FRAUD, ABUSE, OR MISCONDUCT

10.3.1 Missouri Community Action Agencies shall have a written program policy to prevent, detect and deter fraud, abuse or misconduct in the administration of CSBG programs and/or funds. The policy, at minimum, shall include:

- A. an expectation for staff to report a suspicion of fraud, abuse or misconduct;
- B. an assurance that fraud, abuse, or misconduct may be reported anonymously or confidentially within the agency, to the extent possible;
- C. the procedure that employees of the agency should use to report fraud, abuse or misconduct;
- D. the procedure that clients of the agency should use to report fraud, abuse or misconduct.

10.3.2 Agencies shall report all fraud, abuse or misconduct in the administration of CSBG as

soon as the agency determines that there are reasonable grounds to believe that fraud, abuse or misconduct has occurred.

- A. Agencies shall make reports to the Department by contacting the Division of Legal Services (DLS) by email at DLS.ReportVendorFraud@dss.mo.gov.

10.3.3 The agency may be prosecuted under applicable federal and/or state law for false claims, statements, or documents, or concealment of material fact.

10.4 BACKGROUND SCREENING

10.4.1 Missouri Community Action Agencies shall conduct a background screening on all individuals paid in full or in part with funding from CSBG, prior to the beginning of employment.

- A. Agencies shall ensure there is a written personnel policy that describes the background screening procedure for the agency that includes, at minimum:
 1. the frequency at which repeat background screenings are performed;
 2. whether unpaid positions (i.e. volunteers) receive a background screening.

10.4.2 An agency shall not allow individuals to perform duties when the Family Care Safety Registry (FCSR) or other background investigation reveals that the individual has been found guilty, pled guilty, or has been convicted of a civil judgement, felony or misdemeanor conviction for:

- A. child abuse or neglect, or domestic abuse;
- B. any crime in which a child was a victim or a crime against children, to include, but not limited to, any offense involving child pornography.

10.4.3 Agencies shall not allow individuals to perform the duties described herein when the background investigation reveals that the individual has been found guilty, pled guilty, or has been convicted of a civil judgment or felony conviction for:

- A. perjury, false statements, theft or any type of fraudulent activity.

10.4.4 Agencies may allow individuals to perform the duties described herein when the background investigation reveals that the individual has been found guilty, pled guilty, or has been convicted of a civil judgment, misdemeanor for perjury, false statements, theft

or any type of fraudulent activity if:

- A. the agency in good faith finds there are significant mitigating factors which indicate the person would not be a risk to the agency or the agency's participants, and;
- B. the agency fully documents such a finding and reports such findings electronically to DSS for review; and
- C. the agency assumes responsibilities for any financial fraud, abuse, or misconduct by the individual(s) in the administration of CSBG.

10.5 THE FEDERAL HATCH ACT

10.5.1 The Coats Human Services Reauthorization Act of 1998 makes non-profit, Community Action Agencies subject to certain provisions of the Federal Hatch Act. Unless superseded by Federal statute, guidelines, directives or regulations, the following is intended to provide guidance to affected Community Action Agencies concerning the appropriate standards of conduct relative to political activities, as well as to the use of CSBG funds for political purposes.

- A. Programs must be administered in a politically nonpartisan manner and must avoid actions which can reasonably be construed as intended to favor one political party over another or to influence the outcome of an election for public or political office. The use of CSBG funds, the provision of services and the assignment of personnel must not result in the identification of the program with any partisan political activity designed to further any election or defeat of a candidate for public or party office. In addition, CSBG funds may not be used for the provision of services or the assignment of personnel to provide transportation in connection with voter registration or electoral activity. Further guidance on this issue can be found in [CSBG Information Memorandum 81](#).
- B. Political issues in many communities will often include activities which may become the subject of political controversy. Agencies undertake activities dealing with issues related to their basic program responsibilities, such as organizing and advocating for the needs of low-income persons. In carrying out their basic mission and goals, agencies may actively engage in campaigns connected with constitutional amendments, referenda, municipal ordinances, law reform and lawful attempts to influence government officials to respond to the grievances of persons in poverty. Agencies need not avoid such activities merely because partisan officials or candidates for public office may take or have taken positions with respect to the issue. Agency officials acting in their official capacities, however, deal with questions which have become a subject of political controversy on their merits and not because they are

supported or opposed by a particular party or candidate.

- C. Except as set forth in these requirements, employees are free to engage in various kinds of political activities during their off-duty hours and in their private capacities. A broad range of participation in elections is permitted. These restrictions apply to the use of CSBG funds, the provision of services and the assignment of agency personnel in a manner which identifies any CSBG funded programs with partisan political activity, nonpartisan activity associated with a candidate or faction in an election for public office and the transportation of voters to the polls. These restrictions are, in a broad sense, designed to prohibit the use of CSBG funds for certain purposes. As far as the individual employee is concerned, these restrictions deal only with what he or she does as an employee.

10.5.2 The following restrictions apply to all employees, volunteers and board members:

- A. Employees, volunteers and board members must not use their official positions, authority or influence with the agency for the purpose of interfering with or affecting the result of an election or nomination for a party or public office.
- B. Employees, volunteers and board members must not directly or indirectly coerce, attempt to coerce, command or advise an employee or any other person who is subject to these restrictions to pay, lend or contribute personnel services to a party, committee, organization, agency, or person for political purposes.
- C. Employees, volunteers and board members must not use CSBG funds for any political purpose or to influence any election for public or party office.
- D. Employees, volunteers and board members must not permit the use of equipment or premises purchased or leased with CSBG funds for any political purpose or to influence the outcome of any election for public office.
- E. Employees, volunteers and board members must not discriminate, threaten or promise discrimination against or in favor of any employee or beneficiary in the program or any potential employee or beneficiary because of his or her political affiliations or beliefs or require any applicant, employee or beneficiary to disclose his or her political affiliation.
- F. Employees, volunteers and board members must not offer any person employment, promotion or benefits under the program as a reward for the support or defeat of any political party or candidate for public or party office, or threaten or create disadvantage in employment or deprivation of benefits as a penalty of such support, except that such a person may be deprived of employment or subject to lesser penalties for engaging in activities which are forbidden by this section.

- G. Where consistent with State law and local procedures, employees, volunteers and board members may engage in voter registration activity. However, CSBG funds may not be used to transport voters in connection with voter registration or electoral activity. This restriction applies to the use of CSBG funds as well as the provision of CSBG services and the assignment of CSBG funded personnel. All persons may provide such transportation during their off-duty hours so long as they avoid identification of such off-duty activities with the funded agency.
- H. Citizenship education, which includes as part of the curriculum information about the mechanics and functions of voter registration, may be conducted.
- I. Candidates' meetings, even if all rival candidates for one or more public offices appear, must not be sponsored or conducted with CSBG funds or within CSBG purchased or leased facilities. This restriction on use of CSBG funds does not, however, limit the rights of employees, volunteers or board members to participate in candidates' meetings.
- J. An employee is not permitted to be a candidate for public elective office, except that nonpartisan candidacies and candidacy for political party office are permitted. Thus, no employee may run in a primary or general election for public office, except as provided below. An employee planning to be a candidate for partisan public elective office must resign his or her position prior to announcement of his or her candidacy or commencement of substantial activities intended directly to promote said candidacy, whichever occurs first. This restriction applies only to employees. Volunteers and board members are not subject to these restrictions. This section applies to employees even though they are on leave or without pay. The prohibitions are lifted only when employment is terminated.

SECTION 11 – GENERAL

11.1 CITIZEN ACCESS AND PRIVACY

11.1.1 Personal data held by the eligible entity relative to the CSBG supported personnel, programs and activities and participants must be maintained in accordance with applicable standards set forth in the Privacy Act of 1974, as amended.

11.1.2 The documents listed below must be made available for public inspection at the eligible entity's central office at a reasonable time. If the requesting person wishes copies of the document, the eligible entity may request a reasonable fee, not to exceed the actual cost of preparing such documents. Actual cost may include supply, copying, staff and mailing costs. The Missouri Sunshine Law (RSMo Chapter 610, Government Bodies and Records) recognizes that certain records contain private or privileged information. Content identified by the law as exempt need not be disclosed.

- A. CSBG Requests for Proposals as submitted to DSS.
- B. Articles of Incorporation, bylaws and board membership list.
- C. All contracts (including funding, consulting, goods and services and delegate contracts) pertaining to CSBG funds.
- D. Quarterly and annual reports (including audit reports) made to DSS on projects supported by CSBG funds.
- E. Minutes of meetings of the governing board.
- F. Position titles, salary ranges, and job descriptions for all compensated positions.
- G. All other information required by DSS to be maintained by the eligible entity not otherwise exempt under the Sunshine Act.

11.2 COORDINATION WITH MISSOURI LIHEAP

11.2.1 CSBG legislation (1998) requires “an assurance that the State will ensure coordination between anti-poverty programs in each community in the State, and ensure, where appropriate, that emergency energy crisis intervention programs (relating to low-income home energy assistance) are conducted in such community.” DSS will meet the assurance in the following manner:

- A. At least once each year, DSS staff will meet with LIHEAP (Low- Income Home Energy Assistance Program) staff to support ongoing collaboration and to explore avenues for further cooperation between the two programs.

11.2.2 Community Action Agencies must execute the assurance in the following manner:

- A. Community Action Agencies must maintain communication with Missouri Department for Children and Families area offices that distribute LIHEAP funds.
- B. Community Action Agencies must make reasonable efforts to establish procedures for sharing information on recipients of energy assistance services with local LIHEAP programs so that duplication of energy assistance services can be avoided.

11.2.3 DSS staff may review efforts to coordinate services with LIHEAP through its monitoring of Community Action Agencies.

11.3 COORDINATION WITH OTHERS INCLUDING WORKFORCE SYSTEMS

11.3.1 Missouri Community Action Agencies must 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. Entities must coordinate the provision of employment and training activities with entities providing activities through statewide and local workforce investment systems.

11.3.2 DSS staff may review efforts to coordinate services with others including workforce systems through its monitoring of Community Action Agencies.

11.3.3 The Workforce Innovation and Opportunity Act (WIOA) improves job opportunities through an integrated, job-driven public workforce system. This system encourages state and local leaders to work together to reshape the workforce system so that it serves the needs of the nation's most vulnerable citizens. The WIOA demonstrates a renewed focus on serving youth and adults who have limited skills, lack work experience and face barriers to economic success. CSBG is incorporated into the WIOA in the following ways

- A. CSBG employment and training activities are included as a required partner for WIOA one-stop career centers. Under WIOA, the required partners of the WIOA one-stop

career centers may be required to share in infrastructure costs.

(http://caplaw.org/resources/faqs/GrantLaw/CAPLAW_FAQ_WIOA_Sept2015.pdf)

- B. CSBG employment and training activities may be included, at the option of the state, in a WIOA Combined State Plan.
- C. Community Action Agencies are encouraged to review the WIOA and the information found on the CAPLAW website for more information about the opportunities and requirements of WIOA as it applies to CSBG Eligible Entities.

11.4 COMPLAINTS/APPEALS

11.4.1 Community Action Agencies must have an appeal procedure (Item 8.1.3(K)) which includes a process through which applicants for service are made aware of their right to appeal a decision related to their determination of eligibility and addressing claims of discrimination.

11.4.2 Citizen complaints reaching DSS, including those regarding the denial of a CSBG-funded service and/or claims of discrimination, will be handled in the following manner.

- A. A request for administrative review of the adequacy and equitable application of the agency's process must be submitted, in writing, to the Missouri CSBG Program within thirty (30) days of receiving notice of an agency's decision/action. Upon receipt of the request, DSS staff will copy the request for the agency whose decision/action is in question. The agency will be requested to supply documents relevant to its decision/action within seven (7) business days of DSS's receipt of the complaint.
- B. DSS staff will review supporting documents and will respond in writing to the complainant within 30 days of receipt of the request.
- C. If the complainant is dissatisfied with the decision of the CSBG staff, he/she may appeal to the Director of DSS and may include additional documentation appropriate for review. The Director will respond in writing to the appellant within 30 days of receipt of the appeal.
- D. The decision of the Director of DSS is the final administrative remedy in the process. If the complainant is dissatisfied with the final decision, he/she may seek remedy through the court system.

11.5 PARTISAN/NON-PARTISAN POLITICAL ACTIVITY

11.5.1 The Agency shall not carry out programs 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:

- A. any partisan or nonpartisan political activity or any political activity associated with a candidate, or contending faction or group, in an election for public party office;
- B. any activity to provide voters and prospective voters with transportation to the polls or to provide similar assistance in connection with an election; and
- C. any voter registration activity (42 U.S.C. § 9918 as amended).

11.6 STEVENS AMENDMENT

11.6.1 Missouri Community Action Agencies shall comply with the Stevens Amendment that requires federal financial support to be clearly acknowledged by the Agency when programs or projects are funded in whole or in part with federal grant money.

11.6.2 Agencies shall submit all requests requiring Stevens Amendment approval electronically to the Department, and may use one of following templates to satisfy the requirements of that amendment:

- A. If funded wholly by federal funds:
 - 1. This project/program is funded 100% at \$ _____ with federal funds received from the U.S. Department of Health and Human Services provided by the Missouri Department of Social Services.
- B. If funded partly by federal funds received from the U.S. Department of Health and Human Services provided by DSS and partly by other non-federal sources:
 - 1. This project/program is funded ____% at \$ _____ with federal funds received from the U.S. Department of Health and Human Services provided by the Missouri Department of Social Services and ____% at \$ _____ by other non-federal sources.

SECTION 12 – DISCRETIONARY FUNDS

12.1 GENERAL

12.1.1 42 USC § 9901, et seq., as amended, requires that at least 90 percent of each State’s allocation be distributed to Community Action Agencies. No more than 5 percent may be used by the State to cover the cost of administering the grant. The remainder may be used at the State’s discretion for discretionary projects that are consistent with the purposes of the CSBG legislation.

12.1.2 DSS may award discretionary grants for a wide variety of projects as indicated within the CSBG State Plan.

12.1.3 Discretionary funds may be awarded through a competitive Request for Proposal (RFP) process or awarded directly to the Community Action Agencies, MCAN or other eligible entities based on an identified need of the network.

12.1.4 DSS may issue more than one RFP per year, depending on availability of funds.

12.1.5 Organizations eligible to receive grants supported through discretionary funds include Community Action Agencies providing services in Missouri, MCAN, and other organizations with the primary purpose of ameliorating the causes and conditions of poverty in Missouri.

- A. Sections within the Missouri Community Service Block Grant Manual of Policies and Procedures, which address requirements specific to Community Action Agencies, may not apply to all recipients of grants supported through the State’s CSBG discretionary funds.
- B. Organizations selected to receive a CSBG discretionary award will be assessed for eligibility by checking the government-wide Excluded Parties List System in the System for Award Management (SAM), in accordance with the OMB guidelines at 2 CFR 180 that implement Executive Orders 12549 (3 CFR Part 1986 Comp., p. 189) and 12689 (3 CFR Part 1989 Comp., p. 235), “Debarment and Suspension.”
- C. Organizations selected to receive a CSBG discretionary award will be informed of audit requirements and will be assessed for the applicability of the requirements.
- D. Non-community action agencies must demonstrate how they have coordinated with the community action agency in their service area to avoid duplication of efforts.
- E. DSS will complete an assessment of risk on agencies receiving discretionary funding,

utilizing the Department's Risk Assessment tool. Documentation of the risk assessment will be maintained in the agency's program file.

12.2 AVAILABILITY OF FUNDS

12.2.1 By statute up to 5 percent of the State's CSBG allocation may be used for the State's administrative expenses. In the event that the State does not use the entire 5 percent of the total reserved for DSS's administrative expenses, the remainder may be used to fund discretionary projects.

12.3 FUNDING GUIDANCE

12.3.1 As prescribed within the State Plan, DSS will, near the start of each fiscal year, issue funding guidance describing the forms, procedures and deadlines for submission of discretionary proposals. Notice will be sent to each eligible entity and will be posted to the DSS website.

12.4 REPORTING REQUIREMENTS

12.4.1 Projects supported by sublet discretionary funds are subject to reporting requirements defined within the contractual agreement.

12.5 MONITORING

12.5.1 Discretionary awards are subject to a modified system of CSBG monitoring. Information regarding reporting requirements and monitoring will be identified by DSS within the Grant Contract.

Definitions

Business Day: a day in which the Department conducts official business.

Case Management: Case management is the process used to move clients from where they are now to increased self-sufficiency. The process includes a variety of strategies, techniques and resources designed to build on existing strengths while overcoming barriers.

Community Action Agency (CAA): a not-for-profit corporation as defined by 660.370, RSMo, as amended.

Community Action Program: a communitybased and operated program as defined by 660.370, RSMo, as amended.

Compliance Matter/Finding: DSS's designation for a CSBG deficiency in internal controls and/or noncompliance with a policy, law, regulation or contract.

Conflict of Interest: a situation in which there is a personal or financial interest that compromises or could compromise a person's independence of judgement in exercising his or her responsibilities.

Consulting: Consulting refers to the practice of helping organizations improve their performance, primarily through the thorough analysis of existing business problems and the development of plans for improvement. Organizations hire the services of consultants for a number of reasons including, for example, to gain external and presumably more objective advice and recommendations, to gain access to the consultants' specialized expertise or simply as temporary help during a one-time project, where the hiring of permanent employees is not required.

Contractor: the entity receiving funds through a contract with the Missouri Department of Social Services.

CSBG: Community Service Block Grant program established by 42 U.S.C. section 9901 et seq and section 660.370 et seq, RSMo.

Day: a calendar day.

Department: the Missouri Department of Social Services.

Direct Administrative Cost: costs that can be readily identified with delivery of a particular project, service, or activity to achieve an outcome intended by the funding program.

Eligible Entity: A private, not-for-profit agency within the state of Missouri as defined by 42 U.S.C. § 9902, as amended. One that carried a designation as a Community Action Agency or was a qualifying organization serving migrant or seasonal farm workers as of the day before the enactment of the Coats Human Services Reauthorization Act of 1998, has retained that designation and has a tripartite board or one that, subsequent to and in accordance with the Act, has been designated by the Governor, has retained that designation and has a tripartite board. Community Action Agencies are eligible to receive a proportional share of an amount equal to 90 percent of the Missouri CSBG allocation.

Eligible Participant: an individual or family living in a household with income not to exceed 125% of the federal poverty line or receiving Temporary Assistance for Needy Families (TANF) according to the monthly list provided by the Department.

ESG: Emergency Solutions Grant. A federal grant funded by Housing and Urban Development and administered by Missouri Housing Resources Corporation. ESG funds may be used for street outreach, emergency shelter, homelessness prevention, rapid rehousing and HMIS. (<https://www.hudexchange.info/programs/esg/esg-requirements/>)

Executive Director / CEO: For the purposes of this manual, the Executive Director / CEO is that individual who is the senior leader responsible for the day-to-day operation of the CSBG-eligible entity or in the case of a public entity, the senior leader responsible for the day-to-day operation of the CSBG funded operational element.

Federal Fiscal Year (FFY): time period from October 1 through September 30 of the following year, in which the program operates.

Federal Poverty Line: the official poverty line defined by the Office of Management Budget (OMB) based on the most recent data available from the Bureau of the Census, defined in 42 U.S.C. § 9902, as amended.

Household: One or more people living in the same home

Indirect Administrative Costs: costs incurred for a common objective or joint purpose that benefit more than one cost objective and may not be readily assignable to a particular program.

Information Memorandum (IM): Guidance issued by the Office of Community Services to assist in implementing the CSBG legislation, program instruction and policy clarification.

Management Information System (MIS): the Department-funded system to be utilized by the Community Action Agencies for the required tracking of demographic and outcome information.

Mandatory Funds: at least ninety percent (90%) of the total amount of CSBG funds required to be allocated to CAAs from the CSBG grant annually awarded to the state of Missouri by the United States Department of Health and Human Services, Office of Community Support, for the administration of the CSBG program.

Material Aid: Tangible goods and or cash assistance provided with the primary purpose of alleviating a cause or effect of poverty. Cash assistance may be provided in the form of a prepaid debit card, a voucher or direct vendor payment. Within the Missouri CSBG network, goods given as material aid have included such things as school supplies, liquid nutrition, calculators and food vouchers.

MCAN: Missouri Association of Community Action Programs. MCAN is the state association of community action agencies in Missouri. (www.communityaction.org)

Missouri Resident: Black's Law Dictionary defines residency as "bodily presence as an inhabitant in a given place."

NCAP: National Community Action Partnership is a national organization that provides technical assistance, training and other resources to the Community Action network.

Organizational Standards Assessment System: the Department funded system to be utilized by Community Action Agencies for the required tracking and retention of documentation for the purpose of compliance with Health and Human Services and CSBG Organizational Standards Center of Excellence adopted set of standards.

Organizational Standards: Standards for CSBG Community Action Agencies as defined within the U. S. Dept. of Health and Human Services, Administration for Children and Families, Office of Community Services, Division of State Assistance Information Memorandum (IM) 138 (<http://www.acf.hhs.gov/programs/ocs/resource/csbg-im-138-state-establishment-of-organizational-standards-for-csbg-eligible-entities>).

Program Year (Missouri CSBG): October 1 through September 30.

Property: Property means, unless otherwise stated, real property, personal property, equipment, intangible property and debt instruments.

Request for Proposal (RFP): the documents a Community Action Agency must complete outlining plans to provide services to eligible participants of a specific geographic area for which the Community Action Agency is designated to serve.

Secretary: the Secretary of the United States Department of Health and Human Services.

State Agency: refers to the Missouri Department of Social Services.

State Plan: the plan approved by the Secretary of the United States Department of Health and Human Services to secure Missouri's allotment of CSBG funds as described in 42 U.S.C. § 9908, as amended.

State: State of Missouri.

Subcontractor: a person or organization that provides a product or service funded by CSBG funds pursuant to an agreement with an eligible entity.

Subrecipient: refers to the Contractor, Community Action Agency, or eligible entity.

[NASCSP Lexicon of Acronyms and Definition](#)

Information Memoranda

Information Memoranda (IM) published by the Office of Community Services as guidance for implementing the CSBG legislation, program instruction, and policy clarification.

[IM No. 154 CSBG Flexibilities and Waiver Requests](#)

Provides both intermediate and long-term suggestions for state CSBG lead agencies and eligible entities to facilitate the recovery efforts from major disasters

[IM No. 152 CSBG Annual Report](#)

Details guidance and expectations for use of ACSI to improve performance in State Accountability Measures

[IM No. 150 Use of the American Customer Satisfaction Index \(ACSI\) to Improve Network Effectiveness](#)

Encourages states, territories, tribes, state Community Action Agency Associations and eligible entities to implement two-generation approaches to serving children and parents together to increase family economic security and well-being

[IM No. 144 CSBG State and Federal Accountability Measures and Data Collection Modernization](#)

Establishes State and Federal Accountability Measures

[IM No. 138 State Establishment of Organizational Standards for CSBG Eligible Entities](#)

Establishes Organizational Standards for Eligible Entities

[IM No. 116 Corrective Action, Termination, or Reduction of Funding](#)

Provides guidance on the requirements and procedures for termination or reduction of funding

[IM No. 82 Tripartite Boards](#)

Outlines requirements of Tripartite board membership, composition, and key functions

[IM No. 60 Duties and Interests with Respect to Property, Purchased, Constructed, or Improved by an Eligible Entity](#)

Outlines prohibitions on use of CSBG to purchase, construct, or permanently improve land or buildings; includes waiver process

CSBG IM 49: Program Challenges, Responsibilities and Strategies

Establishes ROMA as a requirement for the network

IM No. 37 Definition and Allowability of Direct and Administrative Cost Block Appropriation and Allocations

Provides guidance on using funds for the administration of other programs; direct vs administrative costs