



Community Services Block Grant (CSBG) Policy & Procedure Manual

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COMMUNITY SERVICES BLOCK GRANT

Introduction

Community Services Block Grant (CSBG) Overview

CSBG is a federal block grant administered through the Department of Health and Human Services and the Office of Community and Social Services (OCS). CSBG is a federally-funded grant program created by the [Omnibus Reconciliation Act of 1981](#). In 1998 the Community Services Block Grant (CSBG) was reauthorized through the [Community Services Block Grant \(CSBG\) Act, Community Opportunities, Accountability, and Training and Educational Services Act of 1998, also known as the Coats Human Services Reauthorization Act of 1998](#), which encompasses the most recent federal reauthorization of the Community Services Block Grant (CSBG). Periodically a continuing resolution has to be passed in order to sustain the program.

The CSBG Act ([49 U.S.C. § 9901 et. seq.](#)) was created, “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...” Additional information regarding the CSBG Act can be found online through the Office of Community and Social Services [Community Services Block Grant \(CSBG\)](#) website.

OCS distributes the CSBG funds to states and local communities, working through a network of over 1,100 entities designated to receive funds, known as CSBG-eligible entities and largely Community Action Agencies (CAAs), 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. Funds provide services and strategies to low-income individuals and families to address the causes and conditions of poverty and improve the communities in which they live. Services and strategies support education, employment, housing, health, nutrition, income management, and incorporate case management, self-sufficiency, and re-entry programs.

In accordance with Section 676(a) of the *CSBG Act*, the Governor of Tennessee has designated the Tennessee Department of Human Services (TDHS) as the lead agency for administering the state’s CSBG funds. Since their inception as part of the [Economic Opportunity Act of 1964](#), CAAs have helped low-income Americans escape poverty and achieve economic security.

Tennessee

TDHS’s mission, vision, and core values:

DHS Mission

To build strong families by connecting Tennesseans to employment, education, and support services.

DHS Vision

To revolutionize the customer experience through innovation and a seamless network of services.

DHS Core Values

- High Performance
- Collaboration
- Continuous Improvement
- A Shared Vision
- Customer-Centered Solutions

The TDHS's **CSBG Vision** is that “Everybody should have the equal opportunity to achieve their highest potential in partnership with their families and communities.”

TDHS has been responsible for administering social services programs in the State since its inception in 1937. TDHS is responsible for administering Temporary Assistance for Needy Families (Families First), Child Care Development Fund and Child Care Services, Vocational Rehabilitation (Tennessee Business Enterprise and the Tennessee Rehabilitation Centers), Blind and Visually Impaired Services, Deaf, Sensory Services, Disability Determination Services, Independent Living Services, the Tennessee Technology Access Program (Assistive Technology Services), Adult Day Services, Adult Protectives Services, Social Services Block Grant (Adult Services), and Child Support. With 133 office locations, TDHS is one of the few state agencies with offices in all 95 counties. CSBG is administered through the Child Care and Community Services Division. Contact information for CSBG essential staff is listed in the TDHS [Department Overview](#), which includes an [organization chart](#) and [program descriptions](#).

In 1983, the responsibility to administer CSBG was transferred to TDHS from the Tennessee Community Services Administration, which had administered the program since the enactment of the Community Services Block Grant in 1981.

TDHS currently partners with a network of twenty local CAAs to provide services and strategies throughout each of the 95 counties. Services and strategies are provided based upon the community needs assessments, strategic plan, and community action plan. A map and a list of CAAs' contact information are included in [Appendix 2 Tennessee Community Service Block Grant \(CSBG\) Agencies](#) and [Appendix 3 CSBG Agency Contact Information](#)

Community Action Agencies (CAAs)

CAAs are private, non-profit, and public organizations. They are governed by a uniquely structured tripartite board of directors, comprised equally of elected public officials, private sector representatives, and low-income representatives. This structure is designed to promote the participation of the entire community in assessing local needs and eliminating the causes and conditions of poverty. CAAs create, coordinate, and deliver an array of comprehensive programs and services to low-income individuals and families. CSBG-funded CAAs are CSBG-eligible entities.

CAAs have been designated through the Tennessee Code Annotated (TCA) § 4-29-102 and § 13-26 to include the classifications of CAAs, human resource agencies, or limited purpose agencies. Limited purpose agencies, like CAAs, are private non-profits and must have a tripartite board of directors.

CAAs create, coordinate, and deliver an array of comprehensive programs and services to low-income individuals and families. CSBG is a unique funding source which can help fill the gaps and provide innovative opportunities for the customers and communities CAAs serve. CAAs act as change agents for the clients and communities they serve. They put a human face on poverty,

advocate for those who don't have a voice, and provide opportunities.

CSBG is a network aimed at 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 achieve their highest potential. Funds support a range of services and activities to assist the needs of low-income individuals, including the homeless, migrants, and the elderly. They are governed by a uniquely structured tripartite board of directors, comprised equally of elected public officials, private sector representatives, and low-income representatives. This structure is designed to promote the participation of the entire community in assessing local needs and eliminating the causes and conditions of poverty.

Purpose of the CSBG Policy & Procedure Manual

The CSBG Act only mandates certain aspects of how state CSBG offices will operate in carrying out their defined roles as administrators of CSBG, leaving the authority and flexibility with the State to determine administration of their CSBG programs. This manual defines policies and procedures for the implementation of the Act specific to Tennessee.

The Policy & Procedure Manual:

- Clarifies the federal and state requirements for CSBG;
- Encourages the efficient use and management of these funds;
- Updates current policies and procedures to reflect regulations required of all CSBG recipient agencies and their subcontractors funded through CSBG;
- References both federal and state laws, rules, and regulations which establish the authority of the agency, the CSBG Program, and CAAs; and
- Sets the parameters for eligibility and the use of funds.

Note: These policies and procedures may be amended and updated as necessary.

There are many terms and acronyms that are used across the program. See *Appendix 4* for more information.

Section 1: CSBG Purpose and Funding Guidelines

The Promise of Community Action

Community Action changes people's lives, embodies the spirit of hope, improves communities, and makes America a better place to live. We care about the entire community, and we are dedicated to helping people help themselves and each other.

As outlined by the CSBG Act, the CSBG has the following purposes:

1. Strengthening community capabilities to use available resources related to the elimination of poverty in response to local needs and conditions;
2. Organizing a range of services to impact the causes of poverty in the community to help families and individuals achieve self-sufficiency;
3. Supporting innovative community-based approaches that attack the causes and effects of poverty and community breakdown;
4. Ensuring the maximum feasible participation of low-income people in the process of identifying the problems and needs of low-income communities, as well as the design and evaluation of approaches to meet these needs; and
5. Mobilizing local private, religious, charitable, and neighborhood-based organizations, as well as private individuals in efforts to eliminate poverty.

National Goals

Regardless of the programs provided to customers, the programs must be goal-directed, and support individual/family, community, and/or agency goals. Goals should be results-oriented with predetermined measures used to evaluate success. They include:

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.

Funding

Allocation

Federal requirements stipulate that at least 90% of CSBG funds be passed through to the CAAs. CAAs are required to meet state and federal guidelines and provide a range of services designed to assist low-income and homeless individuals achieve self-sufficiency and improve the conditions of the communities in which they live. Services and strategies provided by the agency will be outlined in the Community Action Plan

Purpose

The CSBG Act requires these funds to be used:

1. To provide a range of services and activities having a measurable and potentially major impact on the causes of poverty in the community or those areas of the community where poverty is a particularly acute problem;
2. To provide activities designed to assist low-income participants, including the elderly poor;
3. To provide on an emergency basis such supplies and services, nutritious foods, and related services, as may be necessary to counteract conditions of starvation and malnutrition among the poor;
4. To coordinate and establish linkages between governmental and other social services programs to assure the effective delivery of such services to low-income individuals; and
5. To encourage the use of entities in the private sector or the community in efforts to relieve or remedy poverty conditions in the community.

Limitations on the Use of Funds

Per Section 678F of the CSBG Act, the following uses are not allowable for CSBG funds:

1. 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 facility.

Note: Assistance with a delinquent mortgage or property tax payment is allowable. A permanent improvement to a home, such as installing a different furnace system or making a change to the inside or outside structure of a home, is not allowed. Agencies are encouraged to contact the CSBG contract manager if they are uncertain whether a specific service is allowable;

2. Leasing of space, buildings, and/or other assets not associated with a CSBG purpose or allowable activity; and
3. Political activity such as:
 - a. Any partisan or nonpartisan activity or any political activity associated with a candidate or contending faction or group, in an election for public or party office,
 - b. Any activities to provide voters and prospective voters with transportation to the poll or provide similar assistance in connection with an election, or
 - c. Any voter registration activity.

For further guidance on allowable uses for CSBG funds, public agencies should refer to the Office of Management and Budget's (OMB) *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (commonly called "[Uniform Guidance](#)"), [2 C.F.R. 200](#), which provides a framework for grants management. State

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guidance is provided through the Tennessee Department of [Finance & Administration Policies \(F & A\)](#).

In addition, Section 678F of the CSBG Act states that CAAs must adhere to the TDHS contract's standard terms and conditions regarding additional limitations of the use of funds as designated by the State. Please refer to the current grant contract for more information on State designated limitations.

Formula

Every year the funds are allocated to each of the CAAs based upon a rolling formula using the average poverty rate within the past three (3) years according to the U.S. Census Bureau's data from the [Small Area Income and Poverty Estimates \(SAIPE\) Program](#), and is updated annually. These policies and procedures may be amended and updated as necessary.

Carry Forward Funds

Unspent funds may be carried over by CAAs into the following year. Funds unexpended by the CAA shall remain with such entity for carryover into the next fiscal year for expenditure for program purposes. Reference [Information Memorandum 61 - Carryover Funds](#)

Expenditures

CSBG funding can be used to develop and provide a broad range of services and strategies as identified through the Community Needs Assessment and Community Action Plan, and as outlined through the Scope of Services and the CSBG Model State Plan through the ten domains:

Employment	Education and Cognitive Development
Income, Infrastructure, and Asset Building	Housing
Health and Social/Behavioral Development (includes nutrition)	Civic Engagement and Community Involvement
Agency Capacity Building	Services Supporting Multiple Domains
Other (e.g. emergency management/disaster relief)	Linkages (e.g., partnerships that support multiple domains)

Services and strategies may be developed and provided in partnership with other federal, state, and local resources to fill the gaps and develop innovative and promising practices to meet the needs of low-income individuals. Services and strategies are provided to low-income individuals and families to address the causes and conditions of poverty and improve the communities in which they live. Services and strategies support education, employment, housing, health, nutrition, income management, and incorporate case management, self-sufficiency, and re-entry programs.

Section 2: CSBG Performance Management System Framework

Performance Management

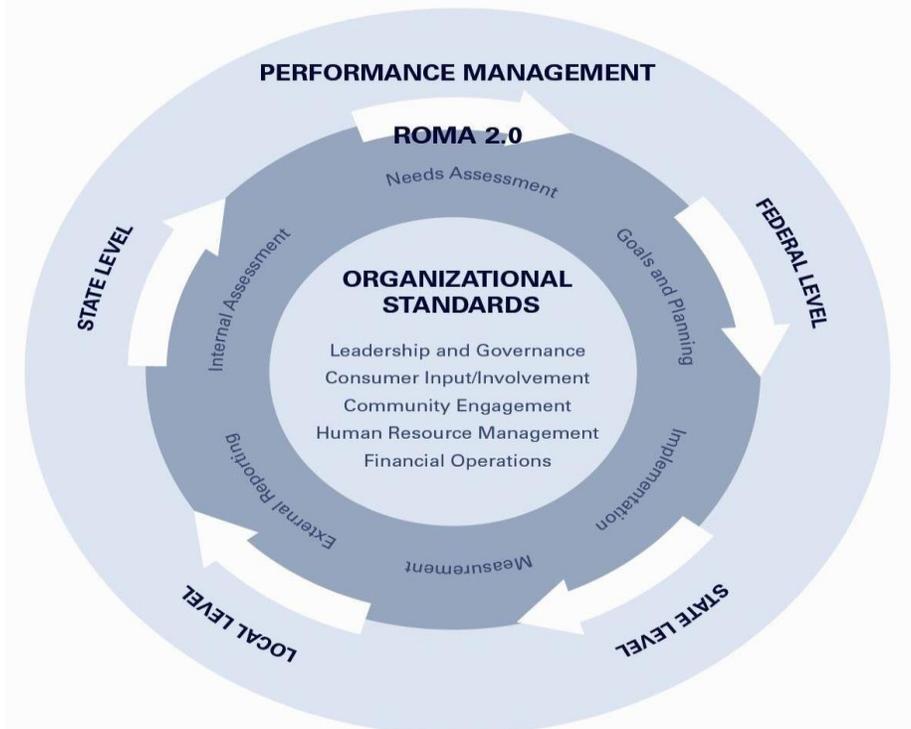
Over the last several years, OCS and the CSBG Network—comprised of CSBG eligible entities, State CSBG Lead Agencies, state CAAs, national partners, and others—have collaborated to create the Performance Management Framework, which is designed to increase effectiveness and accountability across the CSBG Network and generate more robust results for the people and communities they serve.

The Performance Management Framework includes: 1) organizational standards for local CSBG eligible entities; 2) accountability measures for states and OCS; 3) Results Oriented Management and Accountability (ROMA) Next Generation; and 4) the CSBG Annual Report, which includes an updated and refined set of CSBG outcome measures. These elements are designed to increase accountability across all three levels of the network (Federal, State, and local) and enable program administrators at all levels to make better program decisions based on data.

Ultimately, it is expected that this framework will help OCS and the CSBG Network to generate stronger results for people with low-incomes and communities served by the national network of states and eligible entities. Reference [Information Memorandum 152 - CSBG Annual Report](#)

Components of the CSBG Performance Management System

EMPOWERING PEOPLE AND COMMUNITIES TO ALLEVIATE POVERTY



National Goals and Theory of Change

The CSBG Performance Management Framework is based on the [National Community Action Theory of Change](#). The Theory of Change provides an overview of the core principles, performance management framework, and services and strategies implemented and led by the network to achieve the goals of Community Action. Theory of Change provides clear connections among identified needs, populations served, outcomes that are realistic and possible, and how the services and strategies provided will do what they are supposed to do. Theory of Change describes Community Action's mission, vision and purpose, educates local or state legislators, and informs funders about the national framework.

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.

Core Principles

- Build local solutions specific to local needs
- Support family stability as a foundation for economic security
- Advocate for systematic 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

Measures--ROMA: Results Oriented Management and Accountability (Results)

The Results Oriented Management and Accountability (ROMA) Performance Management Framework incorporates the [State Accountability Measures](#), [Federal Accountability Measures](#), [Organizational Standards](#), and the [CSBG Annual Report](#), of which ROMA is a component that requires eligible entities to integrate all the phases of the ROMA cycle into their agency management and administrative processes from conducting the needs assessment, doing agency-wide strategic planning, implementing services and strategies, and reporting and analyzing data which is based upon the [National Community Action Network Theory of Change](#).

The ROMA system was initiated in 1994 by a task force of federal, state, and local CSBG Network officials through the Monitoring and Assessment Task Force (MATF). Based upon principles contained in the [Government Performance and Results Act of 1993](#), ROMA provides a framework for continuous growth and improvement among local CSBG-eligible entities. In 1998, the [CSBG Reauthorization Act](#) made ROMA implementation a requirement for receiving federal CSBG funds.

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An important component of ROMA is the CSBG National Performance Indicators (NPIs), which create a common set of measures to track the CSBG Network's performance with respect to services to low-income individuals, families, and communities. ROMA employs a cycle for implementation that includes community needs assessment; use of needs assessment data to identify service strategies and projected results; implementation of strategies and services; observation and report on progress; and analysis of data according to original benchmarks. The ROMA and NPI framework provide a foundation for targeting of resources based on outcomes and effectiveness of services. For more information on core activities of the State CSBG lead agencies and CSBG-eligible entities for the implementation of ROMA, see [Information Memorandum 49](#) - Program Challenges, Responsibilities and Strategies.

Additional guidance and resources on the Annual Report ten domains and NPIs are available through NASCSP links below:

- https://nascsp.org/wp-content/uploads/2018/07/CNPI-Examples_4.24.18_F.pdf
- https://nascsp.org/wp-content/uploads/2019/01/Other-Indicators_packaged_01-11-19_F.pdf
- <https://nascsp.org/csbg/csbg-data-collection-and-reporting/csbg-annual-report/>

As stated in the CSBG Contract "The Grantee shall submit the CSBG Annual Report on prior-year services, in the format provided to the Grantee, no later than December 30th of the current contract year. Failure to submit the [CSBG Annual Report](#) timely pursuant to deadlines established by the State shall result in program reimbursements being withheld until the report has been received. The Grantee shall meet performance benchmarks, as defined by the State and related to National Performance Indicators. Failure to meet the performance goals will require the Grantee to submit a corrective action plan to be incorporated within the Community Action Plan and approved by the State. Continued failure to meet subsequent performance goals may result in a reduction of funding or termination of contract."

Organizational Standards (Capacity)

[Information Memorandum \(IM\) 138](#) - State Establishment of Organizational Standards for CSBG Eligible Entities, provides guidance and describes State and Federal roles and responsibilities for the establishment of organizational standards as a component of a larger performance management and accountability system for CSBG. Consistent with the authority and responsibilities of the CSBG Act establishes for the Federal office and States, OCS requires states to establish and report on their organizational standards for CSBG eligible entities.

[The Organizational Standards Center of Excellence \(OSCOE\)](#) developed standards are organized in three thematic groups comprising nine categories and totals of 58 standards for private, nonprofit eligible entities and 50 standards for public entities.

1. Maximum Feasible Participation

- Consumer Input and Involvement
- Community Engagement
- Community Assessment

2. Vision and Direction

- Organizational Leadership
- Board Governance
- Strategic Planning

3. Operations and Accountability

- Human Resource Management
- Financial Operations and Oversight
- Data and Analysis

All of the OSCOE developed organizational standards work together to characterize an effective and healthy organization. Some of the standards have direct links to the CSBG Act, such as the standards on the tripartite board structure and the democratic selection process. Some standards link with U.S. Office of Management and Budget (OMB) guidance, such as the standards on audits. As a whole, the standards reflect many of the requirements of the CSBG Act, applicable Federal laws and regulations, good management practices, and the values of Community Action.

The purpose of the organizational standards is to ensure that all eligible entities have appropriate organizational capacity, not only in the critical financial and administrative areas important to all nonprofit and public human service agencies, but also in areas of unique importance for CSBG-funded eligible entities. To fulfill the promise of the standards, States must provide consistent and high-quality oversight and technical assistance related to organizational standards. In addition, based on information about organizational capacity, States must work with the eligible entities to make informed programmatic decisions about how the agencies can best meet the needs of local low-income families and communities.

As outlined in the CSBG Contract, the Contractor shall develop and implement a compliance plan in accordance with the CSBG Organizational Standards issued by the CSBG Organizational Standards Center of Excellence, set forth in [CSBG Information Memorandum \(IM\) 138](#) – State Establishment of Organizational Standards for CSBG Eligible Entities under 678B of the [CSBG Act](#), 42 § 9914 published January 26, 2015. Grantee will implement the Organizational Standards which are applicable, depending on whether Grantee is private, nonprofit CSBG Eligible Entity or a public CSBG Eligible Entity, as set forth in Appendices 2 and 3 of [IM 138](#).

Accountability Measures (Efficiency)

In collaboration with the CSBG Network, OCS has developed State and Federal Accountability Measures to track the organizational performance of State CSBG Lead Agencies and OCS. These measures are part of an enhanced framework for accountability and performance management across the CSBG Network.

The State Accountability Measures capture performance data about the critical activities and functions performed at the State level. They indicate *how efficiently and effectively* the State

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implements the activities described in the State plan, and *what impact* the State's efforts have on the performance of local eligible entities.

The State accountability measures address efficiency and effectiveness characteristics such as timeliness, accuracy, standards, and stakeholder satisfaction in the critical activities and functions listed below:

- Development of State plan, including involving the eligible entities
- Implementation of State plan including:
 - Distribution of funds
 - Use of remainder/discretionary funds
 - Grantee monitoring and corrective action
 - Data collection, analysis, and reporting
 - Organizational standards for eligible entities
 - State linkages and communication

The Federal Accountability Measures are tied to the critical roles and responsibilities of OCS, and, where applicable, align with the State measures. The Federal accountability measures indicate OCS's effectiveness and efficiency as well as the impact its efforts have on improving the performance of State CSBG Offices.

Like the State measures, the twelve Federal measures address such efficiency and effectiveness characteristics as timeliness, accuracy, standards, and stakeholder satisfaction in the following critical activities:

- State plan review and acceptance
- Distribution of funds
- Grant monitoring and corrective action
- Data collection, analysis, and reporting
- Organizational standards
- Training and technical assistance
- Communications
- Grantee satisfaction

OCS requires States to collect, and report on, State CSBG Accountability Measures through their online State plan and annual reports. Concurrently, OCS will collect and report on Federal CSBG Accountability Measures.

Section 3: CSBG Eligibility Policy

Introduction

In order for a family or individual to receive services through a program funded under the CSBG Act, financial eligibility and the need for service must be determined. These funds are not available to nursing home residents because nursing homes offer 24-hour programs utilizing other Federal funds. A family or individual who has not been determined eligible in accordance with the Department's established policies and procedures is considered to be ineligible to receive services. Provision of services to an ineligible customer shall result in financial penalties.

Applicants meeting the income requirements may be eligible for a variety of services. Client eligibility for all services is based on income eligibility and need for the service. OCS has approved the use of 200 percent of the Federal Poverty Level (FPL), as opposed to the prior 125 percent of FPL, as income eligibility for CSBG applicants for both FY20 and FY21 regular CSBG funds and the Supplemental funds through the CARES Act.

To be eligible for CSBG services or benefits, clients must be at or below 200% of the federal poverty line as determined by the federal Office of Management and Budget (OMB) based on the most recent federal Census data and as revised annually (or more frequently) by [U.S. Department of Health and Human Services' Poverty Guidelines](#) (see table below). The federal CSBG law does not require any particular process for determining client income eligibility; nor do HHS regulations. However, in order to ensure that CSBG funds are being used for income-eligible clients, eligible entities should screen for income eligibility. Local CSBG programs are expected to maintain files on clients served by the CSBG program to confirm client eligibility and review use of funds in monitoring visits or upon request. Income eligibility and documentation of the client's need for service must be completed in order to establish client eligibility prior to delivery of services.

2020 Poverty Guidelines for the 48 Continental United States

Number of Persons in Family/Household	100% Federal Poverty Level	125% Federal Poverty Level	200% of Federal Poverty Level
1	\$12,760	\$15,950	\$25,520
2	\$17,240	\$21,550	\$34,480
3	\$21,720	\$27,150	\$43,440
4	\$26,200	\$32,750	\$52,400
5	\$30,680	\$38,350	\$61,360
6	\$35,160	\$43,950	\$70,320
7	\$39,640	\$49,550	\$79,280

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8	\$44,120	\$55,150	\$88,240
	For families/households with more than 8 persons add \$4,480	For families/households with more than 8 persons add \$5,600	For families/households with more than 8 persons add \$8,960

This material establishes the policies and procedures that must be followed in determining the eligibility of all families or individuals receiving services in programs funded through CSBG.

General Provisions

Application for Services

Individuals wishing to apply for services through CSBG may apply online, via mail, or at the designated community action agency (See *Appendices 2 and 3*). Individuals may obtain the state CSBG application online through the [CSBG webpage](#), and [TDHS external Forms and Applications webpage](#). Agencies may ask Individuals specific questions to meet additional intake requirements within the customer's designated area.

Each individual wishing to receive services through a program funded under CSBG must have the opportunity to make application without delay. In other words, the customer's application must be taken at the point he/she comes to the agency and requests that he/she be allowed to apply. All applications for services must be processed within thirty (30) calendar days from the date of application. When eligibility is not determined within the required time frame, the record must reflect clearly the cause for delay in making disposition of the application. The applicant's failure to provide necessary information for the eligibility determination is cause for rejecting the application.

It is required that notification of eligibility status, i.e. notice of approval or denial, be provided. The denial notice must be in written form. If eligibility cannot be determined, the applicant must be informed in writing within fifteen (15) calendar days of the date of the decision. Each individual will attest under penalty of perjury that the applicant is either a United States citizen or qualified alien as defined by [8 U.S.C § 1641\(b\)](#).

Applications must include each of the state-approved indicators through either an agency application or use the state-approved CSBG application, which clearly reflects all the relevant information to the eligibility intake process. This must be provided with the agency's community action plan for each program year. The application/eligibility determination must document all information needed to establish eligibility in accordance with the Department's policies and procedures have been followed in determining the eligibility of each applicant for services. The application/eligibility determination must include the following information either on the form or attached to the form.

- ❑ the name of the applicant, the service(s) for which he/she is applying, and the applicant's statement of why the service(s) is(are) needed
- ❑ the income and sources for all adult and youth (over 18 years of age) members of the household
- ❑ documentation of SSN for all members of the household
- ❑ non-discrimination clause
- ❑ applicant certification which attests and understands their responsibilities that the information is true and correct, asserts and authorizes confidentiality, and adheres to the SAVE Program that they are a United States citizen or qualified alien as defined by 8 U.S.C § 1641(b).
- ❑ the applicant's signature and date of application
- ❑ if someone other than the applicant applies for the service(s) on his/her behalf, the application must be signed and dated by that individual with his/her relationship to the applicant stated
- ❑ the explanation of how the applicant's representative is in a position to know his/her circumstances
- ❑ the agency worker who takes the application must sign and date the form on the date the applicant or his/her representative signs and dates it
- ❑ the supporting documentation to establish eligibility, i.e., current income verification documents
- ❑ the agency worker establishing eligibility must initial and date the eligibility determination section on the date eligibility is determined
- ❑ documentation of notification of eligibility status
- ❑ method of eligibility determination
- ❑ period of certification

The application form must be completed and eligibility established prior to the initiation of services. Provision of services to an individual for whom eligibility has not been determined shall result in a financial penalty.

Method of Eligibility Determination

With the exception of providing a free standing information and referral service, persons receiving any CSBG service, must be within income guidelines and in need of the requested

services. Eligibility for services must be determined either by client self-declaration or by the verification method.

a. Verifications Method

The verification method is used for services when monetary payments or tangible benefits purchased with CSBG funds are provided. All points of eligibility (need and income) must be verified prior to the customer receiving service. The necessary verifications must be obtained within ten (10) calendar days of the application date.

b. Customer Self Declaration

The declaration method can be used for all services unless monetary payments or tangible benefits purchased with CSBG funds are provided. **EXCEPTION:** If the tangible benefit is donated goods/food, clothing, household necessities, the declaration method can be used to determine eligibility. The applicant's statement of both need and income status will be entered in the appropriate spaces on the application form.

Zero Income

After all avenues of documenting income eligibility are exhausted, self-declaration is allowable, but evidence of the attempts at proving eligibility must be contained in the client file, including a statement signed by the applicant indicating that the individual has no other proof of income. Please refer to Verification for Zero Income Households.

Eligibility Determination Process

In order to determine the eligibility of an individual or family to receive service, a determination of citizenship or qualified alien, need for the service, and financial eligibility according to the CSBG Income guidelines must be established.

A. Citizenship or Qualified Alien

Determine based upon the applicant's signature and attestation on the application form whether he or she is claiming to be a citizen or a qualified alien.

Request that the applicant present ONE (1) of the following documents to verify his or her citizenship for each participant requesting assistance:

- (1) (A) A valid Tennessee driver license or photo identification license issued by the Department of Safety; or
(B) A valid driver license or photo identification license from another state where the issuance requirements are at least as strict as those in Tennessee, as determined by the Department of Safety;
- (2) An official birth certificate issued by a U.S. state, jurisdiction or territory, including Puerto Rico, U.S. Virgin Islands, Northern Mariana Islands American Samoa, Swains Island, Guam; provided, that Puerto Rican birth certificates issued before July 1, 2010, shall not be recognized under this subdivision (c)(2);

- (3) A U.S. government-issued certified birth certificate;
- (4) A valid, unexpired U.S. passport;
- (5) A U.S. certificate of birth abroad (DS-1350 or FS-545);
- (6) A report of birth abroad of a citizen of the U.S. (FS-240);
- (7) A certificate of citizenship (N560 or N561);
- (8) A certificate of naturalization (N550, N570 or N578);
- (9) A U.S. citizen identification card (1-197, 1-179);
- (10) Any successor document of subdivisions (c)(4)-(9); or
- (11) A social security number that the entity or local health department may verify with the Social Security Administration in accordance with federal law.

Request that the applicant present ONE (1) of the following documents to verify his or her *alien status* for each participant requesting assistance:

- i. An applicant who claims qualified alien status shall present two (2) forms of documentation of identity and immigration status, as determined by the U.S. Department of Homeland Security to be acceptable for verification through the SAVE program

NOTE: Documents demonstrating immigration status may include: Arrival/Departure Record (Form I-94), Permanent Resident Card (Form I-551), Employment Authorization Document (Form I-766) or Foreign Passport and Visa

- ii. If an applicant who claims eligibility as a qualified alien is unable to present two (2) forms of documentation as described above, then the applicant shall present at least one (1) such document that the entity or local health department shall then verify through the SAVE program.

Each Agency shall maintain a copy of all documentation submitted by an applicant for verification in a manner consistent with the Agency's rules, regulations, or policies governing storage or preservation of such documentation.

Any document submitted as citizenship verification shall be presumed to be proof of an individual's eligibility until a final verification is received by the state governmental entity or local health department, and no entity or local health department shall delay the

distribution of any federal, state, or local benefit based solely on the pendency of final verification.

Upon receipt of a final verification that indicates the applicant is not a U.S. citizen or qualified alien, the state governmental entity or local health department shall terminate any recurring benefit and shall pursue action applicable against the applicant under the Tennessee Medicaid False Claims Act or the False Claims Act at Title 4, Chapter 18.

A. Need for Service

The first point to be considered in the eligibility determination process is need for services. Establishing need for service involves knowing the circumstances of the individual or family, and basing the service need upon these circumstances. This involves judgment on the part of the agency staff who will determine eligibility.

The following are some points to be considered in establishing need:

- what is the individual or family's stated reason for requesting service?
- what are the conditions in the home?
- what is the physical and/or mental condition of the person(s) needing service?
- do the home conditions and physical or mental conditions of the person(s) needing service support the stated reason for requesting service?
- is need appropriate under one or more of the service goals within the Ten (10) CSBG Domains?

Need must be established as part of the eligibility determination process, and the case record of each eligible customer must clearly document the need for each service which is being provided. When a monetary payment is made or a tangible benefit is provided, documentation must show clearly how need is substantiated, i.e., through verification of a utility cut-off notice, verification of loss of income, etc. Examples of programs offering monetary payments or tangible benefits are emergency services, including Emergency Homeless Assistance and Emergency Shelter Grants Homeless Prevention, Housing (repairs) and Nutrition Programs.

The guidelines listed under each category may be used in establishing need for the services. These guidelines serve as examples of situations in which individual need can be established. Other situations establishing individual need may be encountered as customers describe their circumstances.

Individual contract agencies may establish policy and procedure in addition to the examples listed above.

B. Financial Eligibility

The second point to be established in determining eligibility is whether the individual or family's household income falls within the CSBG income guidelines. In order to establish this point, the number of individuals making up the household must be determined, as well as the amount of income available to the household.

❑ **Household Size**

A household is defined as any individual or group of individuals living together as one economic unit. The number of individuals in this economic unit will determine household size. **Exception:** There may be situations where "homeless individuals" are temporarily residing with another permanent household. The "homeless individual" would be considered as a separate economic unit from the permanent household only when applying for homeless services.

❑ **Household Income**

Household income is the total gross income for all individuals in a household. Sources of income to be considered and not to be considered are as follows (See "Cash Receipts Include" and "Exclusion" lists for specific inclusions and exclusions of income.)

❑ **Definition of Income**

Income is cash receipts earned and/or received by the applicant household before taxes. Information regarding allowable exclusions can be found in the next section.

Cash Receipts Include:

- ❑ Wages and Salaries before **any** deductions
- ❑ Net receipts from non-farm or farm self-employment (receipts from a person's own business or from an owned or rented farm after deductions for business or farm expenses). Refer to Verification of Income section.
- ❑ Regular payments from social security*, TANF, railroad retirement, unemployment compensation, strike benefits from union funds, workers compensation, veteran's payments, training stipends, alimony, child support, and military family allotments or 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
- ❑ Foster care payments for children and adults

- ❑ Dividends and/or interest
- ❑ Net rental income and net royalties
- ❑ Periodic receipts from estates or trusts; and
- ❑ Net gambling or lottery winnings
- ❑ Black Lung benefits will be considered income except for the first \$20 of each monthly benefit.

Note: Medicare premiums for SSA are not excluded. The gross amount of Social Security Benefits is counted.

Exclusions:

The following Cash Receipts are **not** considered sources of income for the purposes of determining applicant eligibility:

- ❑ Utility allowances provided to public housing and Section 8 tenants
- ❑ Capital gains
- ❑ Any assets drawn down as withdrawals from a bank
- ❑ Money received from the sale of a property, house, or car;
- ❑ One-time payments from a welfare agency to a family or person who is in temporary financial difficulty;
- ❑ Tax refunds;
- ❑ Gifts, loans, or lump-sum inheritances
- ❑ One-time insurance payments, or compensation for injury;
- ❑ Non-cash benefits, such as the employer-paid or union-paid portion of health insurance;
- ❑ 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;

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- ❑ Federal non-cash benefit programs such as Medicare*, Medicaid, Supplemental Nutrition Aid Program (SNAP), school lunches, and housing assistance;
- ❑ Earned income for a child under the age of 18
- ❑ Payments to Vista volunteers
- ❑ Income received under Title V of the Older Americans Act
- ❑ Education benefits received under the GI Bill
- ❑ The value of child care paid by the Department of Human Services and received by client households and;
- ❑ Combat zone pay to the military
- ❑ Foster Grandparent Payments

Note: Medicare premiums for SSA are not excluded. The gross amounts of Social Security Benefits are counted as income.

1. **Proof of Eligibility/Automated Client Certification and Eligibility Network for Tennessee (ACCENT)**

Proof of income can be used to determine earned and unearned income by using the State of Tennessee's case management and eligibility system, ACCENT

- ❑ Based upon eligibility determination made by the State of Tennessee and the associated documentation included in the client for:
 - Families First
 - Medicaid, and/or
 - Supplemental Nutrition Assistance Program (SNAP)
- ❑ And, if the following conditions are met: the client's case is open and active.

2. **Calculation of Income**

Current income is defined as the total income received by the household within the past thirty (30) days of the CSBG application date. The Current Income Detail must be included in the applicant file. Agencies using T.H.O. Software ©, will auto-calculate all bi-weekly income. In the event of THO being offline, or an agency is using another system, income will be calculated as follows:

- If payments are received weekly, multiply the weekly average by 4.33, and round to the nearest cent.
- If payments are received bi-weekly, multiply the bi-weekly average by 2.16, and round to the nearest cent.
- If payments are received semi-monthly, the semi-monthly average multiply by 2.

3. Calculation of Unemployment Income

For purposes of determining eligibility for recipients of unemployment income, divide the maximum benefit by 12 to arrive at the monthly income. Proper documentation must be placed in the client file.

4. Acceptable Forms of Income Verification

All income, including fixed income, for the family or individual must be documented at the time of application and at each redetermination. **Caution:** Fixed income must be verified along with other income, for all services requiring verification. The income will be either declared or verified according to the method of eligibility determination used.

Income verification must show proof of current and representative income. Current income is defined as income received within the past thirty (30) day period of the CSBG application date.

- Paycheck Stubs: Current paycheck stubs (determine the period covered by the check and whether it is representative of usual pay) showing at least thirty (30) days' worth of pay. If current income is not representative of usual pay, agencies are encouraged to use year-to-date amounts. The previous year's year-to-date amount can be used if the current year-to-date does not represent the applicant's current income. When a year-to-date amount is not available, it is acceptable to use thirty (30) days' worth of consecutive paycheck stubs from the period beyond thirty (30) days, as long as the reason is clearly documented, and the period used is reasonably determined to be the most representative of annual income.
- Court Orders: Current Copies of court orders or legal documents.
- ACCENT: If every household member listed on the CSBG application is accounted for in ACCENT under the same address, then ACCENT can be used to verify the household income, regardless of the number of different cases. ACCENT can only be used to verify household income if every household member is listed in ACCENT and is listed under the same address on the Application Entry Individual Demographics (AAEIID) ACCENT screen. All income verification used from ACCENT must fall within the current income timeframe (having been verified within the last twelve months.) Subgrantees must print off all applicable ACCENT screens for unearned (AEFMI) and earned income (AEIEI & AEISE). The Income Budget screen (AEBFN) can only be used if there is one household member listed in ACCENT.
- Child Support or Alimony: Records of county or circuit courts for child support or alimony. If the court documents are over sixty days old, then a child support printout or monthly notice must be provided.

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- Statement of Employment: Written, signed and dated statements from employer(s). Employer statement must be on official company letterhead.
- Income Tax Returns: Copies of income tax returns for self-employed income. Tax returns from the previous year will be accepted up until the April cut-off period, current tax returns are required after that period unless the client has an extension.
- Self-Employment Records: Well-maintained documents by self-employed persons.
- Social Security: Award letters and/or other 'proof of income' letter from Social Security.
Each individual income verification must identify the applicant by either his/her name and/or Social Security Number.
- Zero Income: It is necessary to obtain confirmation when a household unit has zero income. A current employer separation letter is acceptable when verifying zero income (within 30 days). Any household member eighteen (18) years and older claiming zero-income must have a Self-Declaration of Zero Income Statement signed by the Head of Household. All eligible entities will use the self-declaration statement even if household members are listed in ACCENT or provide a current employer separation letter.

After all avenues of documenting zero income are exhausted, a written self-declaration is permissible.

- Statements of relatives and friends should be used only when other sources of verification are not available. All such documentation when considered as a whole, must be reasonable and clearly indicate how the household is surviving without **any** cash income. Gifts of cash or in-kind contributions (food, clothing, etc.) are not considered as cash income. However, in documenting a household's zero income status, all gifts (cash or goods to meet basic necessities) must be documented with a statement of support and placed in the applicant's file.

The statement of support is a written document that must be attached to all applications for assistance by zero income households. The statement of support must be signed by the applicant and the support person who is supplying the information. It must describe the kind of support provided and indicate the relationship between the support person and the applicant. See **Appendix 5** - Sample Statement of Support.

The support statement should verify that the supporting person(s) have not received assistance claiming zero income. Agencies **may** require additional documentation and verification from support person as to the ability to provide support to multiple households. Agencies that are

requiring additional verification must do so consistently for all applicants without bias.

C. Period of Certification

There are two different types of services provided through the CSBG Program—intangible services and tangible services. When an intangible service is provided, a certification period must be established at the point that eligibility is determined. For tangible services, it is sufficient to establish customer eligibility and a certification period is not required. A discussion of the two types of service follows:

1. **Tangible services** - This type of transactional service involves the provision of a tangible benefit to an individual or a family on a one-time basis.

Examples of tangible services are: providing a food order, purchasing a customer's medicine, or making a rent payment. Once the individual or family has been determined eligible, and the benefit has been provided, the service delivery process is completed. If no continuing CSBG services are being provided, the case must be closed.

2. **Intangible services** - This type of service entails the performance of multiple services on the customer's behalf over a period of time by CSBG agency staff typically through a transformational approach.

Examples of intangible services are: income management counseling, education, chore, case management or companionship services. Intangible services by their nature extend over a period of time; and a certification period, specifying the length of time over which a customer will be eligible to receive services, must be established.

Certification

An eligible customer may be certified for any period of time extending up to but no longer than six (6) months from the date eligibility was established unless all members of the household are on a fixed income and no other income is present. When all members of the household are on fixed income from Social Security benefits, SSI benefits, or other pensions with no other income, the certification period may extend up to twelve (12) months from the date eligibility was established.

When a household consists of both members having fixed income, and members having other types of income, the eligibility period cannot exceed six months.

EXCEPTION: For crisis-oriented emergency programs, the certification period cannot extend beyond 60 calendar days.

The effective date of eligibility is the date the customer signs the application when the declaration method is used and the date the agency worker verifies income when the verification method is used. Eligibility must not be determined retroactively.

A certification period must be established for the following programs:

- Employment
- Education and Cognitive Development
- Income, Infrastructures, and Asset Building
- Health and Social/Behavioral Development (*Includes Nutrition* (i.e., meals, education on nutrition, counseling, etc.)
- Linkages
- Services Supporting Multiple Domains

A certification period may or may not need to be established for the following programs, depending upon whether the components provided are tangible benefits or service activities performed on behalf of the customer by agency staff.

- Housing (including homeless services)
- Health and Social/Behavioral Development (*Includes Nutrition* (i.e., food pantry, garden seeds, and supplies)
- Other (*e.g., emergency management/disaster relief*)

D. Changes in Circumstances

The circumstances of a customer may change during the certification period. If the customer reports a change or the agency has reason to believe that a change is likely, eligibility must be determined within 30 calendar days of the change being reported. The change may relate to household size, income, or need for services.

E. Financial Adjustments for Services Provided to Ineligible Clients

Financial penalties in the form of adjustments to the agency's monthly reimbursement will be assessed whenever it is found that the agency has served ineligible customers. The following are examples of how this might occur:

- eligibility is not current

- all income is not documented
- income is not verified for all adult members of the household
- verifications are not complete and do not establish the customer's eligibility
- application is not signed and dated by the applicant, or if appropriate by his/her representative
- eligibility determination section is completed but is not signed and dated by worker determining eligibility
- customer is over income guidelines
- service is provided prior to verification for those services requiring verification method

State of Emergency/Crisis Management

Per [CSBG Information Memorandum \(IM\) 154](#), TDHS will follow Section 673(2) of the CSBG Act concerning flexibility with CSBG funding to support agency disaster responses within existing funding allocations, if the use of such funds aligns with the statutorily allowable activities.

In the case of an emergency, the Tennessee Department of Human Services (TDHS) will provide Tennessee's network of Community Services Block Grant (CSBG)-eligible Community Action Agencies (CAAs) with guidance to aid in service delivery during a time of emergency circumstances through State of Emergency Guidance Memorandum. (See Appendix 7 for an example of State of Emergency Guidance Memorandum)

Case Closure/Appeal Process

1. Tangible Services

When the service being provided is solely the provision of a tangible benefit, the receipt of the benefit concludes the service delivery process, and the case should be closed. In this situation, appeal of termination of services is not an issue.

Agency staff should, however, be sure that the customer understands that receipt of the benefit concludes the service delivery process. The client must receive a written notice (if applicable). Discussion should explore with the customer's need for other services that are available through the CSBG Program. If other services are needed, assistance should be given, as appropriate, for securing them.

2. **Intangible Services**

When a customer has been receiving intangible services and it is determined that he/she is no longer eligible for services, is not being served, or services have been completed; then the case must be closed, and the customer notified accordingly. Customer notification is required in every case in which a certification period has been established. Eligibility determinations must be completed enough in advance of the ending date of the certification period so that the ten-day termination notice will not go beyond the ending of the certification period.

Notification of termination must be in writing, and must include the fact that the customer has ten (10) calendar days to appeal. Closure of an open case is not effective until ten (10) calendar days after the agency has notified the customer. The record must document notification of termination of services.

Depletion of Funding

When funding is depleted, it is appropriate to deny clients based on lack of funds. The agency will inform the client when the next open application period begins, so the client can check to see if additional funding is available. Agencies shall not deny clients until all funds are depleted. A waiting list will be maintained of all CSBG applicants denied due to lack of funds. If additional funds become available during the program year, those CSBG applicants who were denied due to lack of funds will be notified of the change, if there is one.

Grievance Procedure

The grant/contract requires agencies to establish a system through which recipients of service may present grievances about the operation of the service program. This procedure must be explained to each customer or his/her representative if he/she is not competent to understand it, at the time service is initiated. To demonstrate compliance with this provision, the agency must have a written policy which explains how the procedure will be implemented with its customers. The written procedure must include the Department of Human Services as the final step a customer can take regarding a complaint. The TDHS appeal procedure cannot be used until the grievance has gone through the agency's internal procedure and resolution has not been reached.

Each contract agency shall submit a copy of the grievance procedure and any related forms for filing grievance with the annual operational plan.

Appeals

Fair Hearing Process

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An applicant for, or recipient of, assistance or services has a right to appeal any action taken in regard to the assistance or services for which he/she has applied, is receiving, or which has been terminated, and have a right to request a fair hearing for any of the following reasons:

1. Application for service or assistance is denied (**except for lack of funds**);
2. Applicant was not provided an opportunity to submit an application for services or assistance at the time of their initial request;
3. The notification of application status is not made within ninety (**90**) days of date of application; or
4. The client is dissatisfied with the services or assistance for any reason.

Every applicant or recipient of services or assistance shall be informed by local agency staff at the time of application and at the time of any action affecting his/her claim to assistance or services of the following:

1. of his/her right to a Fair Hearing;
2. of the method by which he/she may obtain a hearing; and
3. of his/her right to be represented by an authorized representative, such as legal counsel, relative, or friend. Information and referral services shall be provided to help claimants make use of any legal services available in the community that can provide legal representation at the hearing.

Responsibilities of Local Contract Agencies

The right to appeal is provided to ensure due process for those individuals and families who are denied assistance under any of TDHS programs including the CSBG program. Each agency's Board of Directors will establish procedures for fair hearings at the local level.

When an applicant feels that he/she has been denied services or assistance, or the opportunity to apply for services or assistance, a review hearing will be held upon the applicant's written request. A client who is dissatisfied with the service or assistance that they received may also request a hearing.

Applicants may not appeal when an application is denied due to a lack of funds.

To file a request for a hearing, the applicant must fill out a complaint form (see Grievance Procedures p.16). The applicant will retain a copy of the form. Also, one copy will be provided to the Department Human Services' Community Services office and a third copy will be placed in the applicant's permanent file by the local contract agency.

A letter will be sent to all applicants stating that the application is denied. Also, the letter will state the correct procedures to follow for an appeal of an application denial through the agency's established grievance procedures.

Applicants for services or assistance or clients dissatisfied with the receipt of services or assistance must file their grievance within thirty (30) days of the denial of, or receipt of, the services or assistance. Upon receipt of a request for a hearing, the hearing must be held in a timely manner following the agency's established procedures for fair hearings.

If a client is dissatisfied with the agency's decision, he/she may appeal to the Department. Requests to the Department for a hearing may be made in writing, electronic mail, or telephone within thirty (30) days of the notification of the outcome of the local hearing. No request for a Department-level hearing will be accepted until a hearing at the local level is held, as most issues can be resolved at the local level. A client may make a written request using the TDHS Consolidated Appeal Request. All requests for Departmental level appeals must be submitted to:

STATE OF TENNESSEE
DEPARTMENT OF HUMAN SERVICES

DIVISION OF APPEALS AND HEARINGS

JAMES K. POLK BUILDING, FIRST FLOOR

505 DEADERICK STREET

P.O. BOX 198996

NASHVILLE, TENNESSEE 37219-8996

Telephone (866) 787-8209 Fax (615) 248-7013

TTY 1-(800) 270-1349

Email: AppealsClerksOffice.DHS@tn.gov

<https://www.tn.gov/humanservices>

Following the receipt of a request for a hearing, the Department's Division of Appeals and Hearings will be notified. The client will be contacted by Appeals and Hearings staff to schedule the hearing which will be conducted by a Departmental Hearing Officer. If a request for a hearing is received, the local agency will be requested to submit copies of files and documentation regarding the grievance and the steps taken to address the issues.

State and Federal Requirements

Tennessee state law and federal law require that there be provisions for appeals and fair hearings for applicants and recipients of assistance and services provided by the Department.

If a formal complaint is made to the Federal Department of Health and Human Services (HHS) Office of Community Services (OCS) alleging that TDHS has failed to use CSBG funds in accordance with the federal statute, HHS must, within sixty (60) days after it receives the complaint, provide a written response to the complainant. TDHS will be required to participate in the resolution of the complaint within the period of time designated by HHS.

Applications Not Acted on in a Timely Manner

The same procedures as above apply for denials.

Section 4: Contract Process and Procedures

CSBG Funding Cycle and Contract Year

The federal funding cycle for CSBG state allocations follows the federal fiscal year (October 1 through September 30).

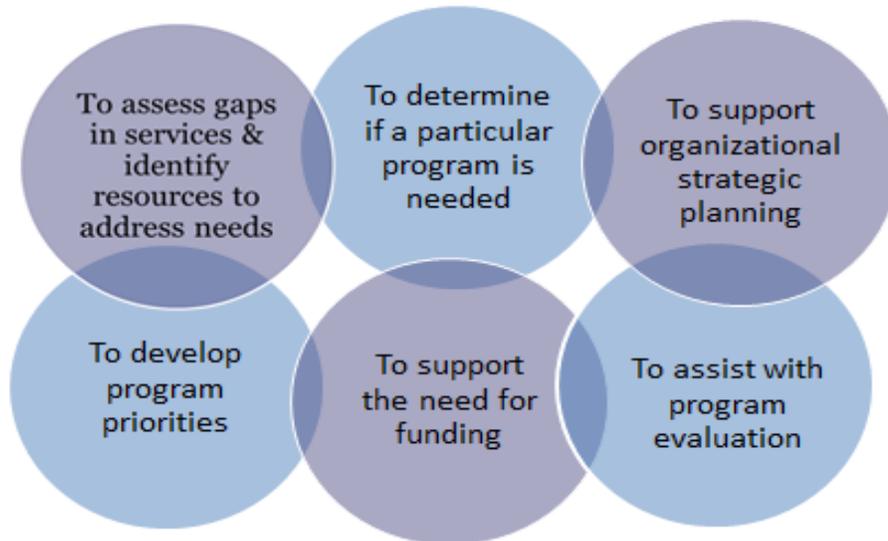
Community Needs Assessment

The Community Needs Assessment (CNA) is the first step of the strategic planning process. In order to assess community needs and to assure maximum impact of CSBG funds, agencies follow the below sequel of program management:



Local control of CSBG resources is predicated on regular comprehensive CNAs that take into account the breadth of community needs as well as the partners and resources available in a community to meet these needs. Regular assessment of needs and resources at the community level is the foundation of Community Action and a vital management and leadership tool that is used across the organization and utilized by the community to set the course for both CSBG and all agency resources.

Why do we do Needs Assessments?



A product of the New York State Community Action Association

Every three (3) years, all contract agencies are required to conduct and submit a CNA. The purpose is to identify the greatest unmet poverty-related needs and the gaps in services for low-income individuals and families in the community, and to ensure that the agency is directing and adjusting its services regularly in response to the changing needs in the community.

The CNA must contain the following components:

1. An analysis of information gathered directly from low-income individuals through methods such as surveys, focus groups, interviews, and/or community forums;
2. Information gathered from community partners including community-based organizations, faith-based organizations, public sector partners, law enforcement, and educational institutions; and
3. An analysis of the most recent U.S. Census Bureau data showing the incidence of poverty in the contract agency's service area and how poverty affects different demographic groups in the community.

Reference: [Section 676\(b\)\(11\) of the CSBG Act](#) , and OCS [Information Memorandum 82 - Tripartite Boards](#)

Contract agencies may want to reference the [Community Assessment Tool Kit](#) available through the Community Action Partnership to assist them in the CNA planning process. In addition, the Tool Kit provides agencies with guidance and a [list of resources](#). CAAs utilize a variety of methods to solicit information in their service area and the conditions and needs of the customers and communities they serve. The contract agencies may want to reference The Community Needs Assessment Toolkit is a guide to conducting needs assessments. The [Comprehensive Community Needs Assessment Tool](#), provided through the Center for Applied Research and Engagement Systems, which provides access to statistical data tables sets such as the U.S.

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Census Bureau, Department of Education, U.S. Department of Labor, and many other sources. Additional data can be used to conduct needs assessment are included below:

Source	Web Page
American Community Survey	http://www.census.gov/acs/www/
Community Commons	http://www.communitycommons.org
Small Area Income and Poverty Estimates Model-based Small Area Income & Poverty Estimates (SAIPE) for School Districts, Counties, and States	http://www.census.gov/did/www/saipe/index.html
U.S. Dept. of Labor Local Area Unemployment Statistics Map	http://www.bls.gov/lau/
National Center for Education Statistics	http://nces.ed.gov/
Housing and Urban Development	http://portal.hud.gov/hudportal/HUD
Center for Medicare & Medicaid Services	http://www.cms.gov/Medicare/Medicare.html
Small Area Health Insurance Estimates (SAHIE)	http://www.census.gov/did/www/sahie/
Council of Economic Advisors	https://www.whitehouse.gov/administration/eop/cea/
HIV/AIDS Prevention & Service Provider Locator	http://locator.aids.gov/

Contract Agencies may also want to consider using data from various sources, including, but not limited to, the [U.S. Census Bureau](#), [U.S. Department of Labor](#), [Nation Center for Education Statistic](#), [U.S. Department of Housing and Urban Development](#), [U.S. Department of Health and Human & Services](#), or [HealthCare.gov for Small Businesses](#).

Strategic Plan

The Strategic Plan is the second step of the strategic planning process. The strategic planning processes, typically conducted every three to five years to align with the Community Needs Assessment, sets the broad goals that guide the agency's programs and operations to meet the needs of low-income individuals, families, and communities. As part of the Organizational Standards, the contract agencies are required to have a strategic plan, or comparable planning document, in place that has been reviewed and accepted by the tripartite board/advisory board body within the past five (5) years.



As [The Office of Economic Opportunity Instruction 6320-1 \(1970\)](#) states, “CAA(s) must develop both a long-range strategy and specific, short-range plans for using potential resources...In developing its strategy and plans, the CAA shall take into account the areas of greatest community need, the availability of resources, and its own strengths and limitations.” Strategic plans are crucially important to the success of agencies for a number of reasons. Perhaps most importantly, they provide an overarching strategy for how programs and services are deployed to address the causes and conditions of poverty identified in the community needs assessment. CAA’s can manage dozens of programs that serve populations from newborns to the elderly across service areas that often span multiple counties and municipalities. A good strategic plan is often the difference between an ineffective agency with uncoordinated services segregated into unconnected “silos” and one that produces good outcomes by providing integrated services that truly meet the needs of the individuals, families, and communities they serve.

Contract agencies should reference the [Strategic Planning Tool Kit](#) available through the Community Action Partnership to help them through the strategic planning process.

CSBG Application and Community Action Plan

The CSBG Community Action Plan (CSBG CAP) is the third step of the planning process. The CSBG CAP helps to connect the performance management system into one document through the community needs assessment, the strategic plan, organizational standards, and the incorporation of the [Results Oriented Management System \(ROMA\)](#) to establish agency performance measures into one document.

The CSBG CAP is an annual plan which provides an update to the strategic planning process. It should align with the agencies’ mission, vision, and goals, the national theory of change and incorporate the following service domains as outlined through the [CSBG Annual Report](#).

Agencies will connect their services and strategies to the following domains:

1. **Employment (EMP)** - Report all federal CSBG funds expended on employment programs for both individual/family services and community strategies.
2. **Education and Cognitive Development (ED&CD)** - Report all federal CSBG funds expended on education and cognitive development programs for both individual/family services and community strategies.

3. **Income, Infrastructure, and Asset Building (II&AB)** - Report all federal CSBG funds expended on income, infrastructure, and asset-building programs, for both individual/family services and community strategies.
4. **Housing** - Report all federal CSBG funds expended on housing programs, for both individual/family services and community strategies.
5. **Health and Social/Behavioral Development *including nutrition* (H&S/BD)** - Report all federal CSBG funds expended on health and social/behavioral programs, for both individual/family services and community strategies.
6. **Civic Engagements and Community Involvement (CE&CI)** - Report all federal CSBG funds expended on civic engagement and community involvement programs, for both individual/family services, and community strategies.
7. **Services Supporting Multiple Domains (SSMD)** - Report all federal CSBG funds expended under services supporting multiple domains, which are programs that span or support outcomes achieved across the multiple domains, for both individual/family services and community strategies such as case management, transportation, and childcare.
8. **Linkages** (*e.g. partnerships that support multiple domains*) - Many of the activities that were associated with Linkages are now captured in Agency Capacity Building, which narrows the definition of Linkages. Linkages include the activities that build partnerships related to community initiatives, work on collaborations, and Information and Referral (I/R) calls. For example, staff time spent at regular Version 1: 2/16/18 CSBG Annual Report Instruction Manual: Module 2 community resource sharing meetings where the purpose is to inform the community about available programs and resources should be reported here. Report all federal CSBG funds expended on linkages hereon both individual/family services and community strategies.
9. **Agency Capacity Building (ACB)** - Report all federal CSBG funds expended on agency capacity building. For example, if staff are involved in the Community Needs Assessment, Strategic Plan, or time spent in training, it should be reported here. Agency capacity building is the training, technical assistance, or other activity that helps a Board member or staff person improve their skills, knowledge, and understanding of CSBG or other programs with the explicit purpose of building the capacity of the CSBG Eligible Entity to achieve results. Activities can include staff development, strategic planning sessions, succession planning, ROMA Activities, Organizational Standards technical assistance, fiscal training, risk assessment, or Board retreats.
10. **Other** (*e.g., emergency management /disaster relief*) - Report all federal CSBG funds expended on activities not easily classified in the other nine categories. The State CSBG Lead Agency will review any funds reported hereto ensure that the activity(ies) can not be reported in one of the other nine categories prior to submitting the CSBG Annual Report to OCS.

Instruction Note: Additional guidance may be found in the [CSBG Annual Report Instruction Manual, Module 2: CSBG Eligible Entity Expenditures, Capacity, and Resources, Ver. 1, February 2, 2018](#).



The purpose of the CSBG CAP is to assist families and individuals to become self-sufficient, mobilize public and private resources to make the entire community more responsive to the needs and interests of the poor, and to bring about greater institutional sensitivity to poverty.

Eligible entities will identify action steps for each proposed strategy, intervention, or program, identified in the work plan. [CSBG Act, Section 676(b) (11)]. The CSBG CAP will address how the agency will address the causes and conditions of poverty, the identified needs, gaps in services utilizing, existing community resources, proposed interventions, services and strategies to address the need.

All contract agencies must submit an annual application that includes an annual update of the CSBG CAP, prioritizes the community needs based upon the prior comprehensive community's needs assessment, and strategic plan. It outlines the agency's plans for use of the CSBG funds and includes signed certifications that the agencies will comply with all federal and state requirements for CSBG grantees.

The CSBG CAP will address the causes and conditions of poverty, identify gaps in services available to address the need, existing community resources, proposed interventions, and strategies or programs to address the need. The CSBG CAP will also include the Results Oriented Management and Accountability (ROMA) national goals and performance indicators to be impacted by the interventions. Eligible entities will identify action steps for each proposed strategy, intervention, or program, identified in the community action plan.

Sufficient time must be allotted in its preparation, bringing together key staff, stakeholders, and board members to be consulted in the review, and analysis, to provide input and direction, in the process and development of the CSBGCAP.

In developing the CSBG CAP staff should refer to the results of the most recent Community Needs Assessment (CNA) which identifies the top needs in the community. The CSBG CAP sets forth a plan of action to address/meet those identified needs, either directly or in partnership with other organizations or through the referral and coordination of efforts to achieve the desired results.

The board of directors' involvement and participation in the CSBG CAP is a vital component of compliance with the *CSBG Act*. The board must receive an update on the progress made on the CSBG CAP at least once every twelve (12) months.

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The board of directors' record should clearly document their ongoing involvement and leadership in the development, implementation, and evaluation of the CSBG CAP. Board ratification of a staff-prepared plan does not demonstrate adequate involvement and leadership in compliance with the *CSBG Act*.

The board should establish processes to ensure ongoing involvement and participation in the development, implementation, and evaluation of the plan that is responsive to the major needs of the low-income population in the community served by the contract agency. The board must also ensure that ROMA goals and National Performance Indicators (NPIs) are incorporated in the formulation of the plan. For this reason, contract agencies' board members must receive ROMA training on an annual basis as outlined in the Organizational Standards.

Reference: Section 676(b)(11) of the [CSBG Act and OCS Information Memorandum 82 \(March 23, 2005\)](#)

The Department will send the CSBG application preceding the contract year, which begins on October 1st. The Department will review and approve the applications prior to issuing contracts.

Contract Approval Process

The contract process begins once the Department approves an agency's annual CSBG Application and CSBG CAP. The Department sends contracts to agencies for signatures, and agencies then have 10 business days, but no later than 5 calendar days before the contract's effective date, to sign and return their contracts. For agencies affiliated with local governments requiring governmental approval for contracts, these agencies must provide the Department with a schedule of the steps for approval through their governmental process, as well as approximate timeframes for this approval process. This information should be provided annually and updated when process changes are made.

Section 5: Grant Administration and Monitoring

Compliance

Contract Responsibilities

As outlined in the CSBG Contract, agencies "shall perform Community Services Block Grant (CSBG) responsibilities in accordance with all applicable CSBG program and fiscal policies and procedures; as applicable through the Office of Management and Budget (OMB) [circulars](#) and [Information Memorandums](#) (IM); and all current procedures as required by the Tennessee Department of Human Services and Tennessee Department of Finance and Administration."

Tripartite Board Requirements

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The State provides assurance that in the case CSBG funds are allocated to a CAA or non-profit organization that each board shall be selected by the agency or organization and constituted to assure that (CSBG Act 676B(a) and (b)):

1. one-third of the members of the board 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 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 requirement;
2. not fewer than one-third of the members are persons chosen in accordance with democratic selection procedures adequate to assure that these members are representative low-income individuals and families in the neighborhood served; and
3. the remainder of the members are officials or members of business, industry, labor, religious, law enforcement, education, or other major groups and interests in the community served.

Further, the State provides assurance that in the case CSBG funds are allocated to a public organization that the board shall be constituted to assure that:

- a. a tripartite board, which shall have members selected by the organization and shall be composed so as to assure that no fewer than one-third of the members are persons chosen in accordance with democratic selection procedures and adequate to assure that these members-
 - b. are representative of low-income individuals and families in the neighborhood served;
 - c. reside in the neighborhood served; and
 - d. are able to participate actively in the development, planning, implementation, and evaluation of programs funded under this subtitle; or
2. another mechanism specified by the State to assure decision making and participation by low-income individuals in the development, planning, implementation, and evaluation of programs funded under this subtitle.

A narrative description concerning how Tennessee will implement Section 676B (a)&(b) of the CSBG Act follows:

1. As a requirement for funding, the Department of Human Services requires each agency which is allocated CSBG funds to submit a copy of its board of directors. The board structure is examined by the Department, and a determination is made as to whether it complies with the CSBG Act requirements. Public agencies will be required

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- to submit documentation of how low-income individuals are involved in planning and implementing the CSBG program.
2. Each agency will have an on-site compliance review conducted by the State at least every 3 years. During this compliance review, the agency board structure is examined.
 3. A clause contained in each grant contract stipulates that the local agency shall comply with applicable Federal regulations in the performance of its duties under the contract. This provision includes Section 676B (a)&(b) of the CSBG Act.

Additional guidance and resources on Board Governance are available through Tennessee Secretary of State: <https://sos.tn.gov/products/charitable-solicitations-and-gaming/2019-nonprofit-guidebook/>

Non-Discrimination Clause

[Title IV of the Federal Civil Rights Act of 1964](#) [42 U.S.C. 2000d], [Section 504 of the Rehabilitation Act of 1973](#) (29 U.S.C. 794), [Section 202 of the Americans with Disabilities Act of 1992](#) (42 U.S.C. 12132), and all regulations related to these Acts address non-discrimination in service delivery to clients. All local offices must ensure that no one, based on race, color, sex, national origin, or handicap, is excluded from participation in, denied the benefits of, or subjected to discrimination under any service or activity for which the federal government provides funding.

Title VI and HIPAA Compliance

Title VI coordinator/responsible party will hold mandated annual Title VI and HIPAA training for agencies. Employee attendance will be documented. Each employee will also be provided with a copy of the agency's Title VI policy.

State CSBG requirements prohibit discrimination against any person on the grounds of handicap, disability, age, race, sex, color, national origin, religion, or any other classification protected by Federal or State constitutional and/or statutory law. No such person shall 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 under [CSBG 678\(c\)](#). A provision in each CSBG contract stipulates this requirement. Monitoring of local agency compliance with all discrimination requirements is done routinely by the State.

Child Support Enforcement

According to the CSBG Act section 678G (2) b: During each fiscal year for which an eligible entity received a grant under section 675C, such entity shall (1) inform custodial parents in single-parent families that participate in programs, activities, or services carried out or provided under this subtitle about the availability of child support services; and (2) refer eligible parents to the child support offices of State and local governments.

Frontline staffs are to inform custodial parents in single-parent families that participate in programs, activities, or services carried out or provided under CSBG about the availability of child support services and are referring eligible parents to the child support offices of State and local governments.

Confidentiality of Client Information

All employees shall be trained annually on client confidentiality, code of ethics and conduct, electronic communications, customer relations, and release of information. This information will be contained in an Employee Handbook/Agency Policy Manual.

Conflict of Interest

Contract agencies shall have a conflict of interest statement signed by all employees involved with the CSBG program.

Documentation and Record-Keeping Processes

In accordance with the requirements set forth in [28 C.F.R. Part 66](#) and [Part 70](#), all financial records, supporting documents, statistical records, and all other records pertinent to the award shall be retained by each sub-recipient organization for at least five years following the closure of their most recent audit report. Retention is required for purposes of Federal and State examination and audit. Records may be retained in an automated format. State or local governments may impose record retention and maintenance requirements in addition to those prescribed. Reference [2 C.F.R. 200.333](#).

The five (5) year retention period starts from the date of the submission of the closure of the single audit report which covers the grant period. If any litigation, claim, negotiation, audit, or other action involving the records has been started before the expiration of the five year retention period the records must be retained until completion of the action and resolution of all issues which arise from it or until the end of the five year retention period, whichever is later.

Reporting

The CSBG Office requires three types of reporting which support federal and state requirements. These include the CSBG Annual Report, child support enforcement, and what services have been provided to TANF customers, and outcome reporting.

CSBG Annual Report

The CSBG Annual Report is a mandatory, annual federal report for every contract agency that receives CSBG grants and all state offices that administer CSBG funds. As outlined in the CSBG Contract agencies “shall submit the CSBG Annual Report on prior-year services, in the format provided to the Grantee, no later than **December 30th** of the current contract year. Failure to submit the CSBG Annual Report timely pursuant to deadlines established by the State shall result in program reimbursements being withheld until the report has been received.”

Department’s Responsibilities for the CSBG Annual Report:

The Department completes Module 1, and aggregates and reports data from all contract agencies for Modules 2-4, and submitting a final report to the Office of Community Services through the Online Data Collection (OLDC) system.

Contract Agencies’ Responsibilities for the CSBG Annual Report:

Each contract agency must complete Modules 2-4 of the CSBG Annual Report, reporting financial, agency, community, and individual/family level outcomes. Contract agencies are also responsible for maintaining back-up documentation to support the data reported in their CSBG Annual Report. It is important to note that the CSBG Annual Report relates to all of the agency’s activities, not just services directly funded by CSBG.

Additional guidance and resources are available through NASCSP: <https://nascsp.org/csbg/csbg-data-collection-and-reporting/csbg-annual-report/>

Monthly Client Service and Module 4 Reports

Contract agencies shall submit a monthly client services and Module 4 reports in the format provided by the State, by the **15th of the month** as supporting documentation to the agency’s monthly invoice. Payment of the monthly invoice is contingent upon receipt of the monthly client services report.

TDHS Annual Report

The Department requests annual submissions of agency success stories to be included in the TDHS Annual Report. In order to sustain a bank of agency success stories, TDHS requests that each agency provide a success story be submitted to the department at the end of each month. Stories should be submitted to CSBG.DHS@tn.gov and must include the TDHS Public Release form. Additionally, requests may be made by the close of the state fiscal year or by the Department for communications and other reporting purposes.

Invoice Requirements

All invoices shall be submitted to the State using the State authorized invoicing template within thirty (30) days after the end of the calendar month in which subject costs incurred or services were rendered by the CAA, and include all necessary supporting documentation as outlined in the Grant Contract to:

Department of Human Services

CSBG.DHS@tn.gov

Agencies may request an extension for extenuating circumstances. An email shall be sent to CSBG Program Staff and Fiscal Services requesting and extension.

Monitoring

The [CSBG Act of 1998 Section 678B\(a\)\(1\)](#) of the CSBG Act requires that the State shall conduct a full onsite review of each CSBG recipient at least once every three (3) years. Monitoring is one of many block grant management responsibilities held by the State CSBG office. Monitoring can assist CSBG eligible entities, predominately CAAs, to continually improve outcomes as they strive to adopt high impact strategies to end poverty. It is an important part of a strong partnership that should be forged between State CSBG offices and the CAAs to build capacity at the local level and to provide training and technical assistance to CAAs in working to eliminate poverty. State Associations are also an important part of the training and technical assistance needs that may arise from monitoring. Community Action leaders at the national, state, and local levels work together to ensure the Network is strong. Monitoring of CAAs is a state responsibility, but strengthening the capacity of CAAs to develop a high performing network is a shared responsibility among all members of the CAA Network.

Note: Due to the risk of COVID19 to the entities staff and the state agency's staff, monitoring of the CSBG grantees will be conducted as desk reviews.

In an effort to increase accountability and achieve results, OCS launched several initiatives in 2012 that ultimately developed the current Performance Management Framework. The framework includes a set of organizational standards for CAAs, a new emphasis on analysis of data and achievement of results under ROMA, and the development of state and federal accountability measures. All elements of the framework are important for monitors to know and understand, in particular the Organizational Standards which were released in January 2015. The Standards reflect many of the requirements of the CSBG Act, applicable Federal laws and regulations, good management practices, and the values of Community Action.

[Information Memorandum 138](#) provides direction to States, the District of Columbia, U.S. Territories, and CAAs to establish and report on the Organizational Standards for CSBG eligible entities. Annually, the State CSBG office is responsible for assessing the status of standards among all CAAs and for reporting the results of the assessment in the CSBG Annual Report to OCS.

In addition to the Organizational Standards and monitoring, there are other tools available to strengthen CAAs' capacity and outcomes. Local agency internal assessments, such as the Community Action Partnership's Standards of Excellence, Head Start self-assessment, training and technical assistance, peer-to-peer exchanges, learning communities, needs assessments, Community Action plans, and Results Oriented Management and Accountability (ROMA) are all tools that are essential to maintain and strengthen agency capacity.

Monitoring Principles

Mutual Respect

In working with grantee boards, staff, and consultants, State CSBG offices value and recognize the unique knowledge, ability, and independence of each person. State CSBG

offices are committed to treating all persons fairly and maintaining credibility by matching actions with words.

Open Communication

Effective communication is key in facilitating good working relationships with partners, and State CSBG offices are committed to keeping lines of communication open. The purpose of communication is to assist in developing solutions to problems, to share program improvement ideas, and provide information on new developments in the anti-poverty field. State CSBG offices communicate frequently through a variety of tools and media. State CSBG offices should be open to contact and are committed to listening to suggestions/concerns. This aids the State CSBG office in gaining an understanding of local operations and assisting CAAs in pursuing priorities.

Joint Problem Solving

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

Monitoring Practices

The State CSBG office assesses the health of the entire CAA, not just program-by-program compliance. Such assessments include general oversight, desk reviews, and on-site reviews of the following: Community Action Plan and/or contract, needs assessments, service delivery systems, administration and management systems, strategic plans, board and governance systems, review of ROMA implementation, and financial systems. The assessment of Organizational Standards is completed annually either through a desk review or incorporated as part of the monitoring process.

Practice 1 - State monitors look at more than compliance with program rules and regulations.

In assessing the health of an agency, state monitors will not look solely at compliance with particular program criteria or the Organizational Standards. Individual CAAs may have expertise in select programs or services and may excel in any 'snapshot' view of the CAA. However, the same agency may be having difficulty in operating other programs or may be delivering sub-standard services throughout the rest of the organization. State monitors take a systems view of each CAA and note the quality of service delivery and program operations throughout the agency.

The overall health of a CAA encompasses more than just technical compliance with specific program mandates. In order for a CAA to be truly 'healthy,' it must continually strive to find better ways to use programmatic resources to help people move out of poverty. How the CAA has implemented the Organizational Standards is also an indicator of overall health. CAAs who have board members and staff aware of the Organizational Standards and who are actively tracking their progress are better equipped to carry out programs in their community. CAAs who go beyond minimally complying with the Organizational Standards and embrace the intention of the standard result in stronger boards, finance departments, and programs.

Programs operated by a CAA must contribute to the agency's overall mission, and each program must achieve measurable outcomes that help to change the lives of people with low-incomes. The extent to which a CAA sets performance goals within the ROMA framework, systematically collects and analyzes data on performance measures, and adjusts its short and long-range plans based on that analysis, constitutes significant evidence of a CAA's commitment to making a difference for the families it serves and the communities in which it works.

Practice 2 - State monitors assess the effectiveness of the board of directors.

An effective board is critical to the overall health of a CAA. When only a few board members regularly attend board meetings, the CAA is not being led by a fully engaged group of community members. The tri-partite structure of private non-profit and public CAA boards of directors ensures that voices from all segments of the community have the opportunity to participate in shaping the direction of the CAA. Without full participation, the CAA lacks valuable points of view in its decision-making process.

An effective board clearly understands the mission of the agency and offers the kind of community-based leadership that is critical to the health of a CAA. A good board understands their role across the Organizational Standards and embraces them and incorporates the standards into their processes. An effective board is one that evaluates CAA programs and operations and ensures agency resources are being used most effectively to produce the outcomes necessary to fight poverty within the community. An engaged board is comfortable in honestly evaluating the executive director to ensure that the CAA has effective leadership. An effective board regularly reviews its own by-laws to ensure that the CAA operates within the legal guidelines. Having a complete and comprehensive understanding of the financial status of the organization is another hallmark of an engaged and active board.

Practice 3 - State monitors assess administrative and leadership capacity of agency management as it relates to meeting the Board of Director's goals.

An effective CAA is flexible and responsive to the needs of individuals and the community it serves, as well as committed to its employees. Communication is evident and widespread in an effective CAA – staff know what is occurring in the organization, what new initiatives are in place, and what new directions are being explored. They know the mission of the CAA and their role in making the mission a reality. Work is distributed throughout the organization, with management support for the staff who do the day-to-day work of meeting the needs of low-income people. Monitors need to be able to assess the degree to which the management of a CAA is leading the organization towards more effective and responsive service delivery.

Practice 4 - Monitoring CAAs is part of a process to strengthen CAAs and the entire Community Action Network.

In order for monitors to assess the health of CAAs, the State CSBG office adopted a systems approach to monitoring. [IM 138](#) allows State Offices the option to incorporate the Organizational Standards into state monitoring processes. Practices outlined above provide a framework for implementing a systems approach and a framework for looking at a CAA holistically.

The monitoring process serves several purposes:

The first is to provide the CAA with feedback about its programs, going beyond compliance to include an assessment of the CAA's ability to impact lives. Good monitoring should help the CAA gauge its effectiveness in fulfilling its mission.

Secondly, the monitoring process assists CAA leaders in making changes that will improve their organizations. Monitoring process can provide CAAs with both an 'early warning system', and a best practice 'catalog'. By highlighting organizational systems that are under-performing or showing signs of stress, agency-wide monitoring can help CAA managers take proactive steps to strengthen their organizations before problems or crises arise. By noting agency strengths, a systems approach to monitoring can help CAA leaders build upon those strengths – allowing the CAA to do more of what they do best.

A third purpose is to provide the State CSBG office with data that can be used to assess the statewide CAA network. State CSBG offices can note any recurring themes or trends in data across multiple agencies and can respond on a statewide basis, rather than only on an agency-by-agency basis. For example, if the number of people moving towards economic security is declining state-wide, it would serve as a "red flag" to the state. Why are fewer people achieving success? Are there pockets in the state where this is more prevalent? Another example might be that several CAAs have new Chief Financial Officers (CFO) leading the State CSBG office to provide a series of trainings to enhance the effectiveness of these individuals and strengthen financial systems throughout the CAA network.

Assisting CAAs move beyond compliance provides State CSBG offices with the opportunity to build capacity in individual agencies and the entire statewide CAA network. This same concept applies on the national level as well. As State CSBG offices identify changing needs and trends, policy modifications and resource allocations can be identified to address the evolving needs on a national scope.

Practice 5 – The State CSBG office has a system in place to document and inform the agency of findings and/or deficiencies.

Monitoring includes a follow-up process. Upon completion of an on-site monitoring visit, the monitor conducts an exit conference with agency staff. The exit conference can include board leadership, but should never be conducted without CAA staff presence. During the exit conference, strengths, as well as areas in need of improvement, findings, and/or deficiencies, are discussed. Agencies receive a timely written report after an on-site visit which will officially inform an agency of its status. State monitors are cognizant of the [State Accountability](#)

Measure 4Sa that requires monitoring reports to be disseminated to CAAs within thirty (30) business days of the end of monitoring fieldwork.

Practice 6 – The State CSBG office has a system in place to provide training and technical assistance when necessary.

Monitoring includes providing training and technical assistance. The State CSBG office has a means of providing training or technical assistance to CAAs in need of support and/or resources. This assistance may be provided by the State CSBG office directly, through a CAA association, a peer CAA, a local or national TA provider, and/or any other mechanism which is deemed appropriate.

Practice 7 – The State CSBG Office has considered the Performance Management Framework.

The State CSBG office and CAAs should be familiar with all aspects of the Performance Management Framework, the Organizational Standards, ROMA, and the State Accountability Measures and incorporate them into the monitoring process. The Organizational Standards provides a set of 58 standards for how CAAs structure their boards, planning, human resource management, financial operations, and other administrative and management functions. Understanding the standards is critical to knowing if a CAA is truly operating beyond compliance. ROMA is a complete management and accountability process that is focused on the results achieved from a CAA's activities. Consistent ROMA implementation means a CAA is thoughtful about program planning and intentional about meeting the needs of individuals and families and their community. When monitors incorporate the Performance Management Framework into their monitoring, they can begin to understand the CAA as a whole.

Definition of Monitoring

Monitoring is the review process used to determine a subrecipient's compliance with the requirements of a state and/or federal program, applicable laws and regulations, and stated results and outcomes. Monitoring also includes the review of a subrecipient's internal controls to determine if the financial management and the accounting system are adequate to account for program funds in accordance with state and/or federal requirements. Monitoring should result in the identification of areas of non-compliance with the expectation that corrective action will be taken to ensure compliance.

Grant oversight continues to remain a key priority for distribution of federal funds. Simply put, because the threshold for federal auditing requirements has increased, OMB has built in the funds for contractual/agency monitoring including both the programmatic side of the grant as well as the fiscal components of the grant (the scope being less than that of a full audit). See more at: <https://www.tn.gov/finance/looking-for/policies.html>

Audit Requirement

Non-Federal entities that expend \$750,000 or more in Federal funds (from all sources including pass-through subawards) in the organization's fiscal year (12-month turnaround reporting period) are required to arrange for a single organization-wide audit conducted in accordance with the provisions of Title 2 C.F.R. Subpart F (200.500 et seq.).

Procedure

The Department ensures integrity and accountability through the oversight of audit services, fiscal, and programmatic compliance with Federal and State rules, policies, and procedures, and investigations of fraud, waste, and abuse while ensuring integrity and accountability.

Entities that spend \$750,000 or more of CSBG funds are required to provide the department with a Single Audit report not later than 9 months from the end of the fiscal year. The department reviews the Single audit report for findings and questioned costs. If the Single Audit Report has findings, the department requires the entity to provide corrective actions to remedy the findings. The department follows up on the corrective actions being taken to remedy the finding through desk reviews or the on-site monitoring process.

The [CSBG Act of 1998](#) Section 678B(a)(1) of the *CSBG Act* requires that the State shall conduct a full onsite review of each CSBG recipient at least once every three (3) years. Newly designated eligible entities will be monitored immediately after the completion of the first year in which the agency receives CSBG funds. Staff from the Department's Program Review and Internal Audit staff conducts on-site monitoring activities for the CSBG program.

The Department may monitor an agency more frequently if the agency has special issues or problems; has failed to meet goals, standards, or requirements established by the State; has experienced turnover in its executive director, program manager, and/or chief financial officer positions; or has had other federal, state, or local grants other than CSBG terminated for cause. In particular, the Department is required to review the cause of termination for other federal grant programs to assure that comparable issues do not exist for CSBG funds.

The Department conducts on-site monitoring of each CAA at least once every (3) years, with high-risk agencies being monitored annually. Fiscal and programmatic review and monitoring are conducted throughout the year through a process of continuous improvement. The State CSBG office provides oversight and review of all aspects of the Performance Management Framework, the Organizational Standards, ROMA, and the State Accountability Measures and incorporates them in the monitoring process. The State CSBG assesses the health of the entire CAA, not just program-by-program compliance. Such assessments include general oversight, desk reviews, and on-site reviews of the following: Community Action Plan and/or contract, needs assessments, service delivery systems, administration and management systems, strategic plans, board and governance systems, review of ROMA implementation and financial systems. The assessment of Organizational Standards are completed annually through a desk review or incorporated as part of the monitoring process.

Emphasis in monitoring is placed on administration, efficiency, program design and implementation, customer eligibility (including reviews of outcomes) and recordkeeping.

The Department of Human Services' Community Services staff has developed program policy to which agencies are evaluated. Monitoring staff will attempt to complete their program review in one visit. CSBG agencies are notified in writing of the findings of the review. If problems are identified, the CSBG agency is asked to submit a corrective action plan to the Department of Human Services for approval. If the review indicates the agency needs training or technical assistance, the Department of Human Services program staff provides follow-up. A copy of the

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review report and any corrective action activity is maintained in the Department of Human Services' file.

Emphasis in monitoring is placed on administration, efficiency, program design and implementation, customer eligibility (including reviews of outcomes) and recordkeeping. The Department of Human Services' Community Services staff has developed program policy against which agencies are evaluated. Audit Services is responsible for performing monitoring activities in accordance with the State of TN Department of General Services Central Procurement Office [Policy 2013-007](#), to ensure that Federal and State awards are used for authorized purposes in compliance with laws, regulations, and the provisions of contracts or grant agreements and ensuring performance goals are achieved.

Policy 2013-007:

1. Issued by the Department of General Services, Central Procurement Office.
2. Sets criteria on the selection of subrecipient contracts to be monitored in any given fiscal year.
3. Requires state agencies to submit monitoring plans annually.
4. Provides monitoring guidance.
 1. Audit Services Provides Monitoring to:
 - Determine subrecipient compliance with the requirements of state and/or federal programs, applicable laws and regulations and stated results and outcomes: Programmatic Monitoring.
 - Ascertain if internal control over financial management and accounting systems are adequate to account for program funds in accordance with state and federal requirements: Fiscal Monitoring.
 2. Subrecipient Agency Preparation for a Monitoring Visit:
 - Subrecipients can expect to be monitored programmatically and fiscally at least once during any three-year grant contract period (some subrecipients will be monitored annually).
 - Subrecipient agencies are selected for monitoring based on their level of risk as determined by Audit Services. Examples of criteria used to determine risk are the number of grants received, the amount of funding received and previous areas of concern. Based on the level of risk a subrecipient may or may not be identified for a monitoring review in any given year of their contract period.
 - Prior to an on-site monitoring visit, subrecipients will receive notification from Audit Services detailing the date and time of the monitoring visit in addition to what information will be requested. The agency may be requested to send some documents prior to the visit. The information requested for the monitoring visit may include completed, printed year-to-date program fund source annual reports. These will be provided to the program monitor at the time of the review. It is Audit Services' expectation that all agencies scheduled for a monitoring visit will be prepared and have available all the information requested when the visit is arranged. Additional documentation may be requested at the time of the review. Failure to cooperate fully with the monitoring process will result in written documentation of the agency's lack of compliance.
 3. On-site Monitoring Review Expectations:
 - The on-site monitoring review will start with an entrance conference. It is expected that the project director and fiscal director will be present during this time. The chairperson

of the governing board or designee, and authorizing official are also encouraged to attend this meeting. The monitor will explain the review process and the monitoring schedule. The project director should make sure that all requested information is available before the review.

- The agency director and fiscal director should be available during the entire review related to their responsibilities. The monitor will require explanation of supporting documents supplied by the agency. Additional information will be needed during most reviews. Equipment and other purchases through the grant should also be made available for inspection when possible by the agency. If needed, the agency should contact the program monitor before the review to arrange workable solutions concerning availability of equipment.
 - All grant funded staff should also be available for interviews by the program monitor. The monitor has the prerogative to interview staff in private. This may include grant funded staff and other agency staff associated with the grant. The monitor may elect to do telephone interviews with staff in field offices. The agency should provide phone numbers and a list of staff locations.
 - The exit conference will be held at the end of the review. Again, the project director and fiscal director should be available at the exit conference. The board chairperson or designee and authorizing official are encouraged to attend. The monitor will discuss any known findings and/or observations at this time and the corrective action plan submission procedure.
4. Disposition and Monitoring Report
- At the conclusion of all monitoring review requirements, a monitoring report will be issued within thirty (30) business days. The report will be issued to the subrecipient, Audit Services management as well as to the Comptroller of the Treasury/Division of Audit. The monitoring report must be maintained on-site by the subrecipient as part of the subrecipient grant file.

Agency Response—Corrective Action

Subrecipient Monitoring Reports may include four possible results:

1. No findings of Non-compliance – Audit Services does not identify any area(s), either programmatic or fiscal, that do not comply with specific criteria found in state or federal statutes, rules and/or regulations, subrecipient grant contract(s), state departmental policy for the subrecipient program, or good business practice.

If Audit Services monitoring review results in no findings of noncompliance, no further action from the subrecipient is needed.

2. Findings of Non-compliance – If the Department determines through a monitoring review that an agency is not in compliance with state and/or federal CSBG requirements, that problems are identified, the Department will identify the specific deficiencies in a monitoring report.

The monitoring report will document the basis for the Department's determination and the agency will be asked to develop and provide a Corrective Action Plan (CAP) and a timeline

within thirty (30) days of the date of the monitoring report to address the issues identified in the monitoring report.

The CAP must include:

NOTE: If the subrecipient has any questions regarding the report or their required written response to a noncompliant finding or observation report then they should contact their Program Director for assistance.

- A formal statement of whether the subrecipient agency agrees with the finding or not.
 - A detailed plan of how the agency will correct each individual finding to prevent this or similar finding in the future or justification for the subrecipient's disagreement with the finding(s).
 - Attachment of any subrecipient documents, forms, policy changes, reports, accounting tools, time sheets, data collection forms, etc. that ensures the subrecipient has corrected the finding(s).
 - If the subrecipient disagrees with a finding(s) identified, detailed documentation must also be submitted to refute the questioned finding(s).
 - The CAP must be signed by the Authorized Official or their designee (The designee is the person granted permission to sign the Authorizing Official's signature.)
3. Findings of Noncompliance Resulting in Questioned Costs In addition to all the requirements listed above in Section 2. (b). (Findings of Noncompliance) the subrecipient will need to repay all Questioned Costs listed in the Monitoring Report. To repay the Questioned Costs, a check (made payable to the State of Tennessee) must be submitted for the total of the Questioned Costs with the Corrective Action Plan within the allowed thirty (30) calendar days from the issuance date of the report to:

TDHS Community Services Fiscal
James K. Polk Building, 16th Floor
505 Deaderick St., Nashville, TN 37243-1403

Please list the contract number on the check or in the correspondence attached to the check in order for the repaid questioned costs to be applied to the proper fiscal year and the proper subrecipient contract number.

4. Observations - An observation does not generally result from noncompliance as a finding, but rather is a situation observed by a monitor that is deemed to be a potential problem or of interest to the grantor agency and therefore is reported.
- a. If a monitoring review identifies an observation, the subrecipient will be allowed thirty (30) calendar days from the issued date of the report to submit a response explaining

the observation and outlining how the agency plans to correct the observation, if necessary.

b. The CAP for Observation(s) should include:

- A statement of whether the subrecipient agency agrees with the observation or not.
- A detailed statement of how the agency will address each individual observation to prevent a finding in the future, if needed.
- Attachment of any subrecipient documents, forms, policy changes, reports, accounting tools, time sheets, data collection forms, etc. that ensures the subrecipient has corrected the observation, if needed.
- If the subrecipient disagrees with an observation(s) identified by Audit Services, detailed documentation must be submitted to refute the questioned observation(s).
- The CAP must be signed by the Authorized Official or their designee. (The designee is the person granted permission to sign the Authorized Official's signature.) **Address all observations in the same manner as findings.**

5. **Programmatic & Fiscal Monitoring Corrective Action Plans:**

Finding(s) of Non-compliance and Observation(s) can be combined and submitted as one document for either one or more contracts managed by the agency. CAPs for Finding(s) of Non-compliance should be **emailed** to the CSBG Program Director. It is not necessary to mail a hard-copy. **Questioned Cost repayment must be mailed according to the instructions above in #3.**

The CAP must be completed by either the Agency Director or their designee, signed by the Authorized Official or their designee (The designee is the person granted permission to sign the Authorized Official's signature.) and be submitted no later than thirty (30) calendar days after the issue date of the Audit Services Subrecipient Monitoring Report.

TDHS RESPONSE:

Upon receipt of a CAP or Observation Report, TDHS will review and determine its adequacy. The Department will have thirty (30) days to approve the agency's proposed CAP or specify the reasons why the proposed plan cannot be approved. If TDHS finds the CAP or Observation Report is adequate, then TDHS will issue a letter of approval. In the event concerns remain, TDHS will determine what additional steps are needed and relate those requirements to the subrecipient in writing with an expected date of response by the subrecipient.

All official correspondence regarding the monitoring report and subrecipient responses will be sent by email to the contract Authorized official, the agency director, and other interested individuals as appropriate.

All correspondence, including email, from Audit Services to the subrecipient regarding the monitoring report and subrecipient responses must be maintained on site by the subrecipient as part of the subrecipient grant file.

6. CORRECTIVE ACTION PLAN (CAP) GUIDELINES

The CAP must include:

1. A statement of whether the subrecipient agency agrees with the finding or not.
2. A detailed plan of how the agency will correct each individual finding to prevent this or similar finding in the future or justification for the subrecipient's disagreement with the finding(s).
3. Repayment of all Questioned Costs listed in the Monitoring Report. See instructions in previous Section 3 above.
4. Attachment of any subrecipient documents, forms, policy changes, reports, accounting tools, time sheets, data collection forms, etc. that ensure the subrecipient has corrected the finding(s) and following the CAP.
5. If the subrecipient disagrees with a finding(s) identified by Audit Services, detailed documentation must also be submitted to refute the questioned finding(s).
6. The CAP must be signed by the Authorized Official or their designee. (The designee is the person granted permission to sign the Authorized Official's signature.)

Fiscal Review

Submission:

CAAs submit budget revisions and monthly invoices, and quarterly expense reports for expenditures, reimbursement, and payment as outlined through the grant contract, with all necessary supporting documentation to CSBG.DHS@tn.gov

As stated in the CSBG contract, CAA shall put financial and budgetary best practices in place to limit budget revisions to three (3) per year. If grantee exceeds this amount of budget revisions, grantee will be obligated to attend a mandatory training with DHS to assist in creating a sustainable budget.

All invoices shall be submitted to the State within thirty (30) days after the end of the calendar month in which subject costs were incurred or services were rendered by the CAA. An invoice submitted more than thirty (30) days after the end of the calendar month in which costs were

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incurred or services rendered will NOT be paid. The State will not deem such costs to be allowable and reimbursable by the State unless, at the sole discretion of the State, the failure to submit a timely invoice is warranted. The CAA shall submit a special, written request for reimbursement with any such untimely invoice. The request must detail the reason the invoice is untimely as well as the CAA's plan for submitting future invoices as required, and it must be signed by the authorized signatory.

Review:

The Department reviews the expenditures reported on the agency's reimbursement report/invoice. Staff compares reimbursement reports with the agency's contract budget to determine liquidation rates and appropriate line-item expenditures. The agency's quarterly expenditure reports are also reviewed to determine that they agree with the monthly invoice amounts and that expenditures appear to be reasonable and properly charged in accordance with the agency's approved cost allocation plan. This comparison enables staff to determine the amount of unexpended funding in each contract at the end of the contract period.

If the agency's reports indicate problems in overspending, costs are questioned, adjusted, or otherwise unresolved before the end of the contract period's final reimbursement, the invoice, budget revision, quarterly expense report, or cost allocation plan may be returned to the agency until adjustments are made. The agencies may request technical assistance with fiscal issues which include bookkeeping systems, cost allocation plans, and fiscal reporting and budgeting. This technical assistance will be provided as needed.

Training, Technical Assistance, and Other Activities

The Department must offer training and technical assistance (as required by Section 678C (A) of the CSBG Act) if appropriate to help the agency correct deficiencies. If an agency fails to make progress on a CAP, the Department will follow the process outlined in Section 678C of the CSBG Act and the guidelines provided in OCS Information Memorandum 116. As required, the Department will communicate with OCS regarding the situation.

If the agency's reports indicate problems in overspending, costs are questioned, adjusted, or otherwise resolved before the end of the contract period's final reimbursement, the agencies may request technical assistance with fiscal issues which include bookkeeping systems, cost allocation plans, and fiscal reporting and budgeting.

As the lead agency for Tennessee's CSBG program, the Department is responsible for providing entities receiving CSBG funds with a range of technical assistance and training in order to establish and maintain sound grant management and program practices. As outlined in Section 678A of the [CSBG Act](#) training and technical assistance is available throughout the term of the grant. The Department partners with the [Tennessee Association of Community Action](#) (TACA) to provide training and technical assistance to contract agencies throughout the state.

Termination and Reduction of Funding

The State of Tennessee provides assurance that any community action agency which received funding in the previous fiscal year under this Act will not have its present or future funding terminated under this Act or reduced below the proportional share of funding it received in the previous fiscal year unless, after notice and opportunity for hearing on the record, the State determines that cause existed for such termination or such reduction subject to the procedures and review by the Secretary as provided in Section 676(b)(8).

For purposes of making a determination with respect to a funding reduction, the term "cause" includes—

1. A statewide redistribution of funds provided through a Community Service Block Grant under this subtitle to respond to:
 - a. the results of the most recently available census or other appropriate data;
 - b. the establishment of a new eligible entity;
 - c. severe economic dislocation; or
2. The failure of an eligible entity to comply with the terms of its agreement to provide services under this subtitle. [678C(a)]

For purposes of making a determination with respect to a termination, the term "cause" includes the material failure of an eligible entity to comply with the terms of its agreement and Community Action Plan to provide services under this subtitle.

The CSBG agency shall be given notice if funding is to be terminated or if funding is to be reduced below its proportional share.

1. A written notice shall be sent to the CSBG agency stating the Department intends to terminate its CSBG funding or reduce its funding level below its proportional share, not less than twenty (20) days from the date of the notice. The notice shall contain the cause of the termination and time, date, and place of a hearing on the matter to be held not less than ten (10) days from the date of the letter. Just cause for termination will consist of any breach of the CSBG contract by the agency.
2. A public hearing shall be conducted to review the cause of the proposed termination. The panel shall consist of one representative each from the following TDHS offices: Assistant Commissioner for Child Care and Community Services, Director of Audit

Services and Director of Finance. The panel members shall convene the hearing and issue its recommendation(s) to the Commissioner within seven (7) days after the hearing.

3. The Administrative Hearing Official shall notify the CSBG agency of the Department's final decision on the case within fourteen (14) days after the hearing.
4. A copy of the record of the public hearing shall be furnished to the Secretary of Health and Human Services, and no decision to terminate an agency's CSBG funding shall become effective until a finding by the Secretary of the Department of Health and Human Services confirms the State's finding of cause.

Designation and Re-Designation

The State shall give special consideration in the designation of local community action agencies to any community action agency, which was receiving CSBG funds under any Federal anti-poverty program on the date of enactment of the CSBG Act. The State, before giving such special consideration, shall determine that each agency met program and fiscal requirements established by the State. If no such agency exists during the year because of any change in the assistance furnished to programs for economically disadvantaged persons, the State shall give special consideration in the designation of community action agencies to any successor agency which is operated in substantially the same manner as the predecessor agency which did receive funds in the preceding fiscal year for which the determination is made.

When a geographic area of the state is not being served by an eligible entity during the year, the Governor of the state may solicit applications from, and designate as an eligible entity:

1. a private nonprofit organization (which may include an eligible entity) that is geographically located in the unserved area, that is capable of providing a broad range of services designed to eliminate poverty and foster self-sufficiency, and that meets the requirements of this subtitle; and
2. a private nonprofit eligible entity that is geographically located in an area contiguous to or within reasonable proximity of the unserved area and that is already providing related services in the unserved area.
3. when no qualified organization in or near the area is identified or determined to be qualified to serve the unserved area as an eligible entity the Governor may designate an appropriate political subdivision of the state, with demonstrated effectiveness, to serve as an eligible entity for the area. In order to serve as the eligible entity for that area, the political subdivision shall have a board or other mechanism as required in section 676B(a)(b).

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A description follows on the State's method of implementing section 676A of the CSBG Act. The state has given special consideration and designated twenty (20) CSBG agencies to administer local CSBG programs as required by the CSBG Act. The Department has determined that each of the agencies designated to receive CSBG funds has met the necessary program and fiscal requirements of the State.

Appendices

Appendix 1 TDHS Mission, Vision and Values

TENNESSEE DEPARTMENT OF HUMAN SERVICES

DHS Mission, Vision & Core Values

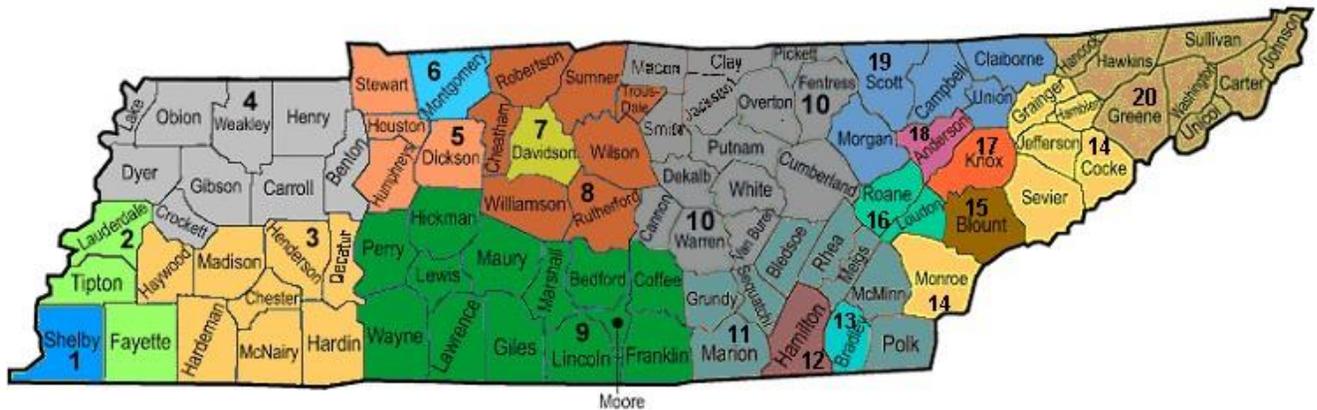
DHS Mission
To build strong families by connecting Tennesseans to employment, education and support services.

DHS Vision
To revolutionize the customer experience through innovation and a seamless network of services.

DHS Core Values
High Performance
Collaboration
Continuous Improvement
A Shared Vision
Customer-Centered Solutions

TN Department of Human Services

Appendix 2 Tennessee Community Service Block Grant (CSBG) Agencies



- | | |
|---|---|
| 1. Shelby County Community Services Agency | 11. Southeast Tennessee Human Resource Agency |
| 2. Delta Human Resource Agency | 12. Chattanooga Youth & Family Development |
| 3. Southwest Human Resource Agency | 13. Bradley-Cleveland Community Services Agency |
| 4. Northwest Tennessee Economic Development | 14. Douglas-Cherokee Economic Authority |
| 5. Highland Rim Economic Corporation | 15. Blount County Community Action |
| 6. Clarksville-Montgomery County CAA | 16. Mid-East Community Action Agency |
| 7. Metropolitan Action Commission | 17. Knoxville-Knox Community Action Agency |
| 8. Mid-Cumberland Community Action Agency | 18. Anderson County Community Action |
| 9. South Central Human Resource Agency | 19. Mountain Valley Economic Opportunity |
| 10. Upper Cumberland Human Resource Agency | 20. Upper East Tennessee Human Development |

Appendix 3 Tennessee Community Services Block Grant (CSBG) Agencies

<p>Anderson County Community Action Commission Leyla Keinanen, Executive Director Susan T. Bowling, Transitioning Executive Director Angie Simmonds, CSBG Coordinator 149 North Main Street Clinton, TN 37716 (865) 457-5500 (865) 457-5502 fax <i>Serving Anderson County</i></p>	<p>Blount County Community Action Agency Tammy Pirie, Executive Director Mitzi Long, Director of Community Services 3509 Tuckaleechee Pike Maryville, TN 37803 (865) 983-8411 (865) 681-1781 fax <i>Serving Blount County</i> www.blountcaa.org</p>
<p>Bradley-Cleveland Community Services Agency Demetrius Ramsey, Executive Director Naneka Walker, Program Manager 155 Sixth Street, S.E. Cleveland, TN 37320 (423) 479-4111 (423) 479-4113 fax <i>Serving Bradley County</i></p>	<p>Chattanooga Department of Youth & Family Development Lurone Jennings, Sr., Administrator Rachel Howard, Program Director 501 West 12th Street Chattanooga, TN 37402 (423) 643- 6400 (423) 643-6421 fax <i>Serving Hamilton County</i> www.chattanooga.gov/youthandfamily</p>
<p>Clarksville-Montgomery County Community Action Agency Leslie Chiodini, Executive Director Robert Davis, Programs Director P.O. Box 487 150 Lafayette Road Clarksville, TN 37040 (931) 896-1800 (877) 721-1705 fax <i>Serving Montgomery County</i> www.cmccaa.com</p>	<p>Delta Human Resources Agency Adrienne McGarity, Executive Director Chelsey Clay, Programs Director P.O. Box 634 915 Hwy. 51 South Covington, TN 38019 (901) 476-5226 (901) 476-5258 fax <i>Serving Fayette, Lauderdale, & Tipton Counties</i> www.deltahra.org</p>
<p>Douglas-Cherokee Economic Authority Kay Hale, Executive Director Amie Whitworth, Neighborhood Service Center Director P.O. Box 1218 534 E. First N. Street Morristown, TN 37816 (423) 547-4500 (423) 4509 fax <i>Serving Granger, Hamblen, Jefferson, Sevier, Cocke, & Monroe Counties</i> www.douglascherokee.org</p>	<p>Highland Rim David Brown, Executive Director Stacy Baggett, Program Director P.O. Box 208 213 College Street Erin, TN 37061 (931) 289-4101 (931) 289-5311 fax <i>Serving Dickson, Houston, Humphreys, & Stewart Counties</i> www.highlandrim.org</p>

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<p>Knoxville-Knox County Community Action Committee Barbara Kelly, Executive Director Sue Campbell, Management Services Director P.O. Box 51650 2247 Western Avenue Knoxville, TN 37950 (865) 546-3500 (865) 546-0832 fax <i>Serving Knox County</i> www.knoxcac.org</p>	<p>Metropolitan Action Commission Dr. Cynthia Croom, Executive Director Marvin Cox, Program Director P.O. Box 196300 802 2nd Avenue North Nashville, TN 37201 (615) 862-8860 (615) 862-8881 fax <i>Serving Davidson County</i> www.nashville.gov/mac</p>
<p>Mid-Cumberland Community Action Agency Debra Holmes, Executive Director Andrea Scott, Program Director P.O. Box 310 233 Legends Drive, Suite 103 Lebanon, TN 37088-0310 (615) 742-1113 (615) 742-3911 fax <i>Serving Cheatham, Robertson, Rutherford, Sumner, Trousdale, Williamson, & Wilson Counties</i> www.mid-cumberland.org</p>	<p>Mid-East Community Action Agency Jerry Johnson, Executive Director Tonya Williams, CSBG Coordinator P.O. Box 790 315 East Race Street Kingston, TN 37763 (865) 354-0450 (865) 248-8664 fax <i>Serving Loudon & Roane Counties</i> www.mecaa.net</p>
<p>Mountain Valley Economic Opportunity Authority (East Tennessee Human Resource Agency) Gary Holiway, Executive Director Alicia King, CSBG Program Director Cross Park Drive, Suite D 100 Knoxville, TN 37923 (865) 691-2551 (865) 531-7216 <i>Serving Campbell, Claiborne, Morgan, Scott & Union Counties</i> www.ethra.org</p>	<p>Northwest Tennessee Economic Development Council Don Ridgeway, Executive Director Cindy Stephens, CSBG Director, 231 South Wilson Street, Suite 210 9111 Dresden, TN 38225 (731) 364-3228 (731) 354-5163 fax <i>Serving Benton, Carroll, Crockett, Dyer, Gibson, Henry, Lake, Obion, & Weakley Counties</i> www.nwcommunityaction.org</p>
<p>Shelby County Community Services Agency Cherry Whitehead-Thompson, Administrator Donna Gray, Program Manager 2670 Union Extended, Suite 500 Memphis, TN 38112 (901) 222-4200 (901) 222-4240 fax <i>Serving Shelby County</i> www.shelbycountyttn.gov</p>	<p>South Central Human Resource Agency Paul Rosson, Executive Director Sara Brown, Deputy Director 1437 Winchester Highway P.O. Box 638 Fayetteville, TN 37334 (931) 433-7182 (931) 438-0074 fax <i>Serving Bedford, Coffee, Franklin, Giles, Hickman, Lawrence, Lewis, Lincoln, Marshall, Maury, Moore, Perry & Wayne Counties</i> www.schra.us</p>

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<p>Southeast Tennessee Human Resource Agency Chris Kleehammer, Assistant Executive Director Jennifer K Hicks, CSBG & LIHEAP Director P.O. Box 909 312 Resource Road Dunlap, TN 37327 (423) 949-2191 (423) 949-4023 <i>Serving Bledsoe, Grundy, Marion, McMinn, Meigs, Polk, Rhea & Sequatchie Counties</i> www.sethra.us</p>	<p>Southwest Human Resource Agency Mike Smith, Executive Director Lisa Smith, Community Services Director P.O. Box 264 1547 White Avenue Henderson, TN 38340 (731) 989-5111 (731) 989-3095 fax <i>Serving Chester, Decatur, Hardeman, Hardin, Haywood, Henderson, Madison, & McNairy Counties</i> www.swhra.org</p>
<p>Upper Cumberland Human Resource Agency Mark Farley, Executive Director LaNelle Godsey, Community Services Director 580 South Jefferson Avenue, Suite B Cookeville, TN 38501 (931) 528-1127 (931) 526-8305 fax <i>Serving Cannon, Clay, Cumberland, DeKalb, Fentress, Jackson, Macon, Overton, Pickett, Putnam, Smith, Van Buren, Warren & White Counties</i> www.uchra.com</p>	<p>Upper East Human Development Agency Tim Jaynes, Executive Director Norma Tremblay, Community Services Director P.O. Box 46 301 Louis Street (423) 246-6180 (423) 246-5682 fax <i>Serving Carter, Greene, Hancock, Hawkins, Johnson, Sullivan, Unicoi, & Washington Counties</i> www.uethda.org</p>

Appendix 4 Acronyms

CAA	Community Action Agency
CSBG	Community Services Block Grant
CSBG Act	Coats Human Services Reauthorization Act of 1998, reauthorization of CSBG funds
HRA	Human Resource Agency
IM	Information Memorandum, policy directive from the Office of Community Services
LPA	Limited Purpose Agency
NASC	Nation Association for State Community Service Programs
NCRI	Nationally Certified ROMA Implementer
NCRT	Nationally Certified ROMA Trainer
NPI	National Performance Indicator, an outcome measure that demonstrates the impact of the CSBG network's programs and activities
OCS	Office of Community Services
OMB	Office of Management and Budget
ROMA	Results Oriented Management and Accountability, a complete management and accountability process focused on the results achieves by agencies that receive CSBG funds
TACA	Tennessee Association of Community Action
TAHRA	Tennessee Association of Human Resource Agencies
TCA	Tennessee Code Annotated
TDHS	Tennessee Department of Human Services

Additional acronyms and definitions can be found at:

https://nascsp.org/wp-content/uploads/2018/06/Acronyms_and_Definitions.pdf

Appendix 5 Department of Human Services Contact Information

<https://www.tn.gov/humanservices/dhs-department-overview.html>

State Official to Receive the CSBG Grant Award:

Danielle W. Barnes, Commissioner

505 Deaderick Street, 17th Floor

Nashville, TN 237243

(615) 313-4702

Danielle.W.Barnes@tn.gov

Community Services Program Contact

Avé Trotter, CSBG Program Director

Community Services

505 Deaderick Street, 15th Floor

Nashville, TN 37243

(615) 741-7419

Ave.O.Trotter@tn.gov

Audit Services

Sam Alzoubi, Audit Services Director

505 Deaderick Street, 14th Floor

Nashville, TN 37243

(615) 313-5771

Sam.O.Alzoubi@tn.gov

Appendix 6 Sample Statement of Support

STATEMENT OF SUPPORT COMMUNITY SERVICE BLOCK GRANT PROGRAM

I, _____ do hereby certify that during the period of _____ Date
_____ to _____ that I
provided the following support to _____.
_____ Food _____ Clothing _____ Rent _____ Utility Bill
_____ Telephone Bill _____ Gifts * (Specify) _____

**Gifts are contributions of cash, goods, or services for basic necessities made without any commitment for repayment.*

Other (Specify)

I also certify that due to my own circumstances I will no longer provide support to this household/individual.

_____ Signature of Support Person(s)	_____ Address of Support Person
	_____ City, State, Zip
	_____ Telephone Number of Support Person(s)
_____ Signature of Applicant	_____ Relationship to Support Person

Information verified by staff:
PHONE _____
MAIL _____
THIRD PARTY _____

Appendix 7 Sample Emergency and Crisis Management Guidance

- Title:** Community Services Block Grant State of Emergency Guidance Memorandum
- Purpose:** For the Tennessee Department of Human Services (TDHS) to provide Tennessee's network of Community Services Block Grant (CSBG)-eligible Community Action Agencies (CAAs) with guidance to aid in service delivery during a time of emergency circumstances
- Effective Date:** April 20, 2020 *(revised July 1, 2020)*
- References:** IM-ACF-OA-2020-01; OMB Memo M-20-17; 2 CFR 200, Uniform Administrative Requirements, Cost principles and Audit Requirements for Federal Awards, CSBG IM #154 Disaster Flexibilities and Waivers, 2 CFR Part 200 Subpart A, specifically, Section 200.75.

Background

During times of emergency, low-income and vulnerable populations are can be affected disproportionately. Numerous CSBG-eligible CAAs have reached out to request guidance and waivers for supporting the communities they serve. Helping in times of a crisis, meeting emergency needs, and assisting with subsequent recovery are key missions of the Community Action Network and CSBG-eligible CAAs. We have been in regular communication with and received advice from our Program Specialist at the Office of Community Services (OCS) and CSBG State Assistance Director of the National Association for State Community Services Programs (NASOSP) on how to implement procedures in a time of emergency circumstances.

This guidance is to be used for and is effective only during the COVID-19 pandemic and the response to the severe and devastating tornadoes from March 3, 2020 (specifically for Nashville and rural areas of Wilson and Putnam County). These changes will overwrite existing policy and procedure. They remain in effect until TDHS states otherwise in writing. This policy is subject to updates as more information becomes available.

SAFE PRACTICES DURING COVID-19

CAAs are identified as essential critical infrastructure workers under the CSBG Act providing emergency services, housing, nutrition, healthcare, transportation, and other anti-poverty programs to low-income individuals and families. Per Governor Lee's Executive Order No. 22, CAAs are also classified as essential critical infrastructure workers during the State of Tennessee COVID-19 pandemic. CAAs are instructed to adhere to the following guidance while maintaining emergency services to low-income individuals and families.

- Employers should explore whether they can establish policies and practices, such as flexible worksites (e.g., telecommuting, remote workstations) and flexible work hours (e.g., staggered shifts), to reduce the amount of staff in the business site and increase the physical distance among employees and between employees to ensure social distancing strategies are followed.
- Where social distancing is difficult to maintain, the Centers for Disease Control has issued guidance on face masks and coverings. Some local jurisdictions have issued mandates for face masks and coverings, CAAs need to follow the mandates set forth by their respective communities. For CDC guidance, please visit the following link: <https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/cloth-face-cover.html>
- To practice social or physical distancing, stay at least 6 feet (about 2 arms' length) from other people who are not from your household in both indoor and outdoor spaces. For more information visit: <https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/social-distancing.html>
- Promote frequent and thorough hand washing, including by providing workers, customers, and worksite visitors with a place to wash their hands. If soap and running water are not immediately available, provide alcohol-based hand rubs containing at least 60% alcohol.
- Encourage workers to stay home if they are sick.
- Encourage respiratory etiquette, including covering coughs and sneezes.
- Provide customers and the public with tissues and trash receptacles and equipment, when possible.
- Maintain regular housekeeping practices, including routine cleaning and disinfecting of surfaces, equipment, and other elements of the work environment.

ELIGIBILITY DETERMINATIONS

Per OCS IM#154, TDHS will follow Section 673(2) of the CSBG Act concerning flexibility with CSBG funding to support agency disaster responses within existing funding allocations, if the use of such funds aligns with the statutorily allowable activities. CAAs do **NOT** have to request a federal waiver to utilize their existing CSBG funding to support disaster response and assistance to eligible low-income individuals and families.

If a displaced individual or family does not have the eligibility documentation in-hand, emergency procedures may include flexibility in accepting signed statements from the family attesting to eligibility information, pending availability of necessary documents to meet immediate emergency needs.

ALLOWABLE RELIEF EFFORTS

All services provided using CSBG funds must still be permissible expenditures under the CSBG Act. In our efforts to provide immediate assistance to CSBG eligible families, TDHS is providing the below list of examples of permissible services that **CSBG eligible families** may need at this time:

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- Non-perishable and food items, including boxed goods, canned goods, bottled water, and disposable paper/plastic products
- Medications and medical supplies
- Cleaning supplies – brooms/mops, work gloves, garbage bags, dish detergent, laundry detergent and bleach
- Clothing (men, women, children) – t-shirts, socks, shoes, pants/skirts, underwear
- Baby Supplies – baby food/formula, baby wipes, pampers/pull-ups
- First Aid – insect repellent, first-aid items
- Household Items, Supplies, Appliances, Furniture – pots, pans, dishes, silverware, can openers, plastic totes, dish towels, fans, batteries, blankets, cell phone chargers, flashlights/lamps, curtain rods, irons, ironing board, household tools, bed/mattress, bedding, sofas, chair, dinette sets
- School Supplies – paper, notebooks, pens, pencils, backpacks
- Employment Supplies – Work boots, uniforms, work tools
- Rental/Mortgage/Housing/Shelter Assistance
- Utility Assistance
- Transportation Assistance – (bus tokens and gas cards)
- Laundromat Tokens

All other services including, but not limited to, case-management, financial assistance, housing, education, and any other services being provided not otherwise mentioned above, should maintain the practice of client eligibility and income verification consistent with Financial Eligibility and Verification.

Other CSBG documentation requirements for household members issued by the State of Tennessee may be waived on a case-by-case basis if provided to TDHS for prior approval.

INCOME VERIFICATION

OCS has approved the use of **200 percent of the Federal Poverty Level (FPL)**, as opposed to the usual 125 percent of FPL, as income eligibility for CSBG applicants for both FY20 and FY21 regular CSBG funds and the upcoming Supplemental funds through the CARES Act.

When a state of emergency has been declared for Tennessee and if it is no longer possible or practical to obtain income documentation from individuals and/or households needing assistance, a self-declaration of income may be accepted. This self-declaration must be written and include: date; signature; and indication that the client/household meets the required FPL cut-off for CSBG services. The method for acquiring this declaration (may be a log or separate form) should clearly indicate this is an alternative process put in use due to state of emergency. This process may only be used while the state of emergency is in effect, unless TDHS provides other guidance.

In an effort to further decrease administrative burden, the following CSBG Income Exclusions also apply until further notice:

- Zero Income can be determined with proof of client employment termination or the Zero Income Form. Zero Income can be determined at the time of application and projected forward instead of using the past 30 days. If applicable, clients should note the reason for zero income related to COVID-19.
- Direct stimulus benefit payments, such as Economic Impact Payments, from the State or Federal Government due to COVID-19 are excluded from countable income.
- Any type of unemployment payments, such as the \$600 weekly supplemental unemployment benefit, **will** be counted as income.
- Although not counted as income for CSBG purposes, excluded income sources may be used to determine how a household is meeting its expenses.

Agencies can use a modified CSBG application and Income Verification form with the approval of TDHS. This form can be used as documentation if a client is unable to obtain paystubs from their employer. Subgrantees are not required to call and verify. This is for recorded documentation in the client file only.

WAGES AND BENEFITS

You may continue to charge salaries and benefits as long as it is allowable under the CSBG Act and is consistent with your current policy of paying salaries (under unexpected or extraordinary circumstances) from all funding sources (both federal and non-federal). See [IM-ACF-OA-2020-01](#); [OMB Memo M-20-17](#) for additional information.

Federal grant funds may be used to pay for different types of leave (e.g. sick, emergency closures, etc.) so long as the grant recipient follows criteria for leave policy as set forth in the OCS guidance above.

Federal guidance provides that the cost of leave may be charged to federal grants if:

- The leave is provided under the established written leave policies;
- The costs are equitably allocated to all related activities; and
- The organization uses a consistent accounting basis for costing each type of leave.

The costs must also meet the basic considerations for cost allowability in 45 CFR § 75.402-411, requiring that all costs be necessary, reasonable, and allocable.

CAAs should revise or put in place a formal policy that provides for paying staff in light of sick leave, emergency closure, or other reduction in staffing, and such policies should include the criteria above in this section.

SIGNATURES

The following practices can be used to temporarily substitute as client approval until the client signature can be obtained in person:

- Notary Signatures
 - All required notary signatures are temporarily waived.

- Client Signatures
 - Digital, electronic, scanned or photographed copies of signatures are allowed on applications and all forms. Agencies should have a dedicated email address that is used for clients to send applications.
 - Verbal verification via telephone can be taken for application signatures and form verification. The person obtaining verbal confirmations/verifications must document the following on each item verified:
 - Date of initial contact by client
 - Name of person taking the verbal information (subgrantee)
 - Person they are receiving information from (applicant)
 - Date verbal verification received
 - Time of verbal verification
 - Method of receipt (i.e. Telephone)
- The CAA must receive verbal consent from the client to allow verbal verification on each form. The client's consent to allowing verbal verification must be documented on each form in the steps outlined above and noted in the Thomas H O'Neil (THO) system. If a client refuses to allow verbal verification another intake method must be provided (i.e. mail, drop off, electronic).
- Emailed documents, scanned documents, faxed documents and photographed documents should all be accepted. CAAs should have one dedicated email address for applications and documents to be sent to. CAAs must notify clients that the application and/or documents have been received and document the date and individual who provide the notification or receipt (i.e. phone call or return email).
- In case-by-case situations the client's bank statements or other non-standard documentation could be used to verify income if approved by TDHS. Requests to use bank statements or other non-standard documentation must be sent to CSBG.DHS@tn.gov on a case-by-case basis.

Agencies must supply sufficient reasoning, documented in writing and kept with the approval, as to why the specific method of obtaining temporary approval was used. This information must be retained and kept along with the documentation signed in person (when it is obtained) as this will be subject to the normal monitoring procedures and will be used to support the start date for services. During this time, please reach out to TDHS for verification and exception requests based on extenuating circumstances due to COVID-19. Any rule exception request must be emailed to CSBG.DHS@tn.gov and will be decided on a case-by-case basis.

ADMINISTRATIVE REPORTING AND DUE DATE EXTENSIONS

During this time, we know that CAAs will need to re-evaluate priorities to focus on the high-demand of varying community needs due to COVID-19. TDHS will be approving amended Community Action Plans (CAPs). Upon receiving approval of Amended CAPs (to be handled via email to expedite the process), agencies will be able to begin serving families with these approved services.

Please note that TDHS will still need to review budget modifications for any CAP amendments, but will approve CAPs prior to the approval of budget modifications so agencies can begin implementing new or modified services more quickly.

Each CAA should work with their assigned Program Coordinator to develop and monitor plan of activities, services, and budget **NOT TO EXCEED** the CARES Act Supplement contract allocation. Agencies should be prepared to track CARES Act Supplemental funding for CSBG. separately from regular CSBG contracts.

Agency quarterly financial reports are due as regularly scheduled and must include reference to how much FY20 CSBG funding was expended to COVID-19 related assistance during that quarter. A separate quarterly report will be expected for the CARES Act funding expenditures.

COMMUNITY NEEDS ASSESSMENTS

It is expected that agencies will continue to conduct community needs assessments within the required three-year timeframe. If you run into an issue, please contact your CSBG Program Coordinator.

ORGANIZATIONAL STANDARDS AND DESK REVIEWS

It is expected that agencies will continue to follow the Organizational Standards. Agencies scheduled for desk reviews have been granted an extension. All other agencies will be monitored by the TDHS Office of Inspector General, which will contact selected agencies directly for monitoring and auditing purposes. If you run into an issue, please contact your CSBG Program Coordinator.

BOARD ISSUES

Temporarily during this pandemic, agencies will be able to hold virtual board meetings through conference calls or webinars regardless of inclusion in their articles or bylaws. Quorums will be determined by who is on the conference call. Board meeting minutes should note if the meeting was held virtually and should include a list of participants.

Please refer to Governor Lee's Executive Order No. 51 for more guidance and information on how to handle public meetings.

Board vacancies must be filled within 180 days during this time. Agencies should make every effort to fill a vacancy as soon as possible.

Community Services Block Grant (CSBG) Policy & Procedure Manual

TDHS will issue further guidance as the situation evolves. As always, we appreciate agencies' commitment to supporting Tennessee families.

Sincerely,



Avé Trotter, M.S.M
CSBG Program Director
Division of Child Care & Community Services
Tennessee Department of Human Services