State of Ohio

2020–2021
Community Services
Block Grant State Plan

Prepared by:
Ohio Development Services Agency
Community Services Division
Office of Community Assistance

Proposed Amendment
August 2020
DRAFT

Mike DeWine, Governor
Jon Husted, Lt. Governor
Lydia L. Mihalik, Director
2020-2021 CSBG State Plan Summary of Changes

Section 5: CSBG Eligible Entities

5.1 Geauga Community Action was removed from the list of eligible entities.

Section 7: State Use of Funds

7.2 The CSBG allocation was updated to reflect the disbursement of CSBG Coronavirus Aid, Relief, and Economic Security (CARES) funding.

Section 8: State Training and Technical Assistance

8.1 Development will coordinate with eligible training and technical assistance agencies to develop a training plan to meet the needs of all 47 Community Action Agencies.

Section 10: Monitoring, corrective Action, and Fiscal Controls

10.0 Due to the COVID-19 pandemic, on-site monitoring will not occur until 2021.

Section 12: Individual and Community Eligibility Requirements

12.1 In accordance with the CARES Act, CSBG income eligibility has been increased to 200% of the federal poverty guidelines (FPG)
SECTION 2
State Legislation and Regulation

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

2.2 CSBG State Regulation: Does the State have regulations for CSBG?
   • Yes

2.3 If yes was selected in item 2.1 and/or 2.2, attach a copy (or copies) of legislation and/or regulations or provide a hyperlink as appropriate
   • Ohio Revised Code 122.68 provides authority for the State of Ohio to "administer all federal funds appropriated to the state from the Community Services Block Grant Act....and comply with requirements imposed by that act in its application for, and administration of, the funds". http://codes.ohio.gov/orc/122.68
   • Ohio Administrative Code Chapter 122:5-1 has additional rules regarding Community Services Block Grant Funding. http://codes.ohio.gov/oac/122:5-1

2.4. State Authority: Select a response for each question about the State statute and/or regulations authorizing CSBG:
   • 2.4a. Did the State legislature enact authorizing legislation, or amendments to an existing authorizing statute, last year? No
   • 2.4b. Did the State establish or amend regulations for CSBG last year? No
   • 2.4c. Does the State statutory or regulatory authority designate the bureau, division, or office in the State government that is to be the State administering agency? Yes

SECTION 3
State Plan Development and Statewide Goals

3.1 CSBG Lead Agency Mission and Responsibilities:

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

   • The Ohio Development Services Agency (Development) is committed to creating jobs and building strong communities, while ensuring accountability and transparency of taxpayer money and exceptional customer service. Development administers the Community Services Block Grant (CSBG), the Home Energy Assistance Program (HEAP) including the Summer and Winter Crisis Programs, the Home Weatherization Assistance Program (HWAP), the electric Percentage of Income Payment Plan (PIPP) Plus, and its companion Electric Partnership Program (EPP). Additionally, Development administers programs to achieve the State of Ohio comprehensive energy policy such as the State Energy Program.
3.2 **State Plan Goals:**

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

1. Support Ohio Community Action Agencies (CAAs) in meeting all organizational standards
2. Provide training and information to support better board formation, understanding of responsibilities and accountability among CAA tri-partite boards
3. Provide training and technical assistance to Ohio CAAs on the development of the Community Action Plan (CSBG Grant Application) and understanding of the Results Oriented Management and Accountability principals
4. Improve customer service to Ohio CAAs and CSBG recipients

3.3 **State Plan Development**

3.3a *Indicate the information and input the State accessed to develop this State Plan*

- State Performance Indicators and/or National Performance Indicators (NPIs)
- U.S. Census Data
- State performance Management data (e.g., accountability measures, ACSI survey information, and/or other information from annual reports)
- Eligible entity community needs assessment
- Eligible entity plans
- Other information from eligible entities (e.g., State required reports, describe): CSBG program survey of Ohio eligible entities and listening sessions

3.3b **Consultation with (Check all that apply)**

- Eligible entities
- State Community Action Association and regional CSBG T&TA providers
- State partners and/or stakeholders (describe): Ohio Association of Community Action Agencies (OACAA), State Departments of Higher Education, Area on Aging, Governor’s Office of Faith-based and Community Initiatives, Office of Workforce Development at Ohio Department of Job and Family Services, Ohio Association of Foodbanks and The Breathing Association
- National organizations
- Federal Office of Community Services
- Other
3.4 Eligible Entity Involvement:

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

Development received feedback from eligible entities regarding the CSBG State Plan in January 2018 during the OACAA Winter Conference, in July 2018 during the Summer OACAA Conference, at six (6) Development sponsored regional listening sessions, and during the OACAA Winter Conference in January 2019. These sessions provided an opportunity for eligible entities to discuss each section of the 2018-2019 State Plan in preparation for the 2020-2021 State Plan.

Development created and distributed an online survey in April 2019 to provide an opportunity for feedback from eligible entities. The survey was sent to all Ohio CAA Executive Directors and individuals identified as the CSBG Coordinator. The survey contained questions from each section of the State Plan. Respondents either ranked items by importance or described the desired change to the current State Plan.

Development held a CSBG Advisory Committee meeting on August 1, 2019, to gather feedback on the State Plan from the members. The CSBG Advisory Committee is comprised of eligible entities representing each of Ohio’s five regions and local organizations that also serve CSBG eligible customers. Some of the comments and suggestions received included, creating a statewide directory of services, support for the listening sessions and providing more detail in the draft State Plan.

Development conducted a final listening session during the July 2019 Summer OACAA conference. This session focused on the draft 2020-2021 State Plan, changes from the previous State Plan, and any additional feedback. Some of the comments and suggestions received included, creating a statewide directory of services, support for the listening sessions and more training on the National Performance Indicators.

Development held a public and legislative hearing on August 8, 2019 to solicit additional feedback on the development of the State Plan. Testimony from participants referenced the benefits of the CSBG program, appreciation of Development staff and encouragement to collaborate with the local Head Start program.

Development conducted a listening session at the OACAA Summer Conference on July 24, 2020. This session focused on the draft amendment to the 2020-2021 State Plan. Eligible entities requested an updated T&TA plan.
3.4b  **Performance Management Adjustment:** How has the State adjusted State Plan development procedures under this State Plan, as compared to past plans, in order
1.) to encourage eligible entity participation and
2.) to ensure the State Plan reflects input from Eligible Entities?

Based on feedback received, the Development conducted regional listening sessions prior to drafting the State Plan. These sessions provided an opportunity for feedback from stakeholders, closest to where they reside rather than having to travel to a central location. No significant changes were made to the 2020-2021 CSBG State Plan after feedback was considered.

3.5. **Eligible Entity Overall Satisfaction:**
*Provide the State’s target for eligible entity Overall Satisfaction during the performance period:* 65

SECTION 4
CSBG Hearing Requirements

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

- Prior to the CSBG public hearing, a copy of the draft plan was available to the public for review and feedback. The draft plan was also sent to all Ohio CAAs and posted on Development’s website and internal provider website.

4.2.  **Public Notice/Hearing:** *Describe how the State ensured there was sufficient time and statewide distribution of notice of the public hearing(s) to allow the public to comment on the State Plan, as required under Section 676(a)(2)(B) of the CSBG Act.*

- A formal notification of the public hearing was posted by Development ten (10) days in advance of the hearing. The date of the hearing is also listed on Development’s public calendar and internal provider page. Notification of the date, time and location of the hearing was sent to Ohio CAAs and announced during the Summer OACAA conference. Development administers the Low-Income Home Energy Assistance Program and also conducts a public hearing seeking input on the LIHEAP State Plan. Development held both public hearings on the same day, in the same location, one immediately after the other concluded to make it easier for those traveling to provide meaningful feedback on both programs that serve overlapping populations.
### SECTION 5
CSBG Eligible Entities

#### 5.1 CSBG Eligible Entities

<table>
<thead>
<tr>
<th>CSBG Eligible Entity</th>
<th>Public or Nonprofit</th>
<th>Type of Agency [choose all that apply]</th>
<th>Geographical Area Served by county (Provide all)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Adams/Brown Counties Economic Opportunities, Inc.</td>
<td>Nonprofit</td>
<td>Community Action Agency (CAA)</td>
<td>Adams County Brown</td>
</tr>
<tr>
<td>West Ohio CAP</td>
<td>Nonprofit</td>
<td>Community Action Agency (CAA)</td>
<td>Allen County Auglaize County Mercer County</td>
</tr>
<tr>
<td>Kno-Ho-Co-Ashland Community Action Commission</td>
<td>Nonprofit</td>
<td>Community Action Agency (CAA)</td>
<td>Ashland County Holmes County Knox County</td>
</tr>
<tr>
<td>Ashtabula County Community Action Agency</td>
<td>Nonprofit</td>
<td>Community Action Agency (CAA)</td>
<td>Ashtabula County</td>
</tr>
<tr>
<td>Hocking, Athens, Perry Community Action</td>
<td>Nonprofit</td>
<td>Community Action Agency (CAA)</td>
<td>Hocking County Perry County Athens County</td>
</tr>
<tr>
<td>Community Action Commission of Belmont County</td>
<td>Nonprofit</td>
<td>Community Action Agency (CAA)</td>
<td>Belmont County</td>
</tr>
<tr>
<td>Supports to Encourage Low-income Families, Inc. (SELF)</td>
<td>Nonprofit</td>
<td>Community Action Agency (CAA)</td>
<td>Butler County</td>
</tr>
<tr>
<td>Har-Ca-Tus Tri-County Community Action Organization</td>
<td>Nonprofit</td>
<td>Community Action Agency (CAA)</td>
<td>Harrison County Carroll County Tuscarawas County</td>
</tr>
<tr>
<td>Opportunities Industrialization Center of Clark County</td>
<td>Nonprofit</td>
<td>Community Action Agency (CAA)</td>
<td>Clark County</td>
</tr>
<tr>
<td>Clermont County Community Services, Inc.</td>
<td>Nonprofit</td>
<td>Community Action Agency (CAA)</td>
<td>Clermont County</td>
</tr>
<tr>
<td>Clinton County Community Action Program</td>
<td>Nonprofit</td>
<td>Community Action Agency (CAA)</td>
<td>Clinton County</td>
</tr>
<tr>
<td>Community Action Agency of Columbiana County, Inc.</td>
<td>Nonprofit</td>
<td>Community Action Agency (CAA)</td>
<td>Columbiana County</td>
</tr>
<tr>
<td>Ohio Heartland Community Action Commission (OHCAC)</td>
<td>Nonprofit</td>
<td>Community Action Agency (CAA)</td>
<td>Crawford County Marion County Morrow County</td>
</tr>
<tr>
<td>Council for Economic Opportunities in Greater Cleveland</td>
<td>Nonprofit</td>
<td>Community Action Agency (CAA)</td>
<td>Cuyahoga County</td>
</tr>
<tr>
<td>Community Action Partnership of the Greater Dayton Area</td>
<td>Nonprofit</td>
<td>Community Action Agency (CAA)</td>
<td>Darke County Greene County Montgomery County Preble County Warren County</td>
</tr>
<tr>
<td>Organization</td>
<td>Type</td>
<td>Service Area</td>
<td>County/Region</td>
</tr>
<tr>
<td>------------------------------------------------------------------------------</td>
<td>-------------</td>
<td>------------------------------------------------------------------------------</td>
<td>------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Northwestern Ohio Community Action Commission, Inc.</td>
<td>Nonprofit</td>
<td>Community Action Agency (CAA)</td>
<td>Defiance County Fulton County Henry County Paulding County Van Wert County Williams County</td>
</tr>
<tr>
<td>Bridges Community Action Partnership</td>
<td>Nonprofit</td>
<td>Community Action Agency (CAA)</td>
<td>Madison County Union County Shelby County Champaign County Logan County</td>
</tr>
<tr>
<td>Community Action Commission of Erie, Huron, &amp; Richland Counties, Inc.</td>
<td>Nonprofit</td>
<td>Community Action Agency (CAA)</td>
<td>Erie County Huron County Richland County</td>
</tr>
<tr>
<td>Community Action Program Commission of the Lancaster/Fairfield Area</td>
<td>Nonprofit</td>
<td>Community Action Agency (CAA)</td>
<td>Fairfield County</td>
</tr>
<tr>
<td>Community Action Commission of Fayette County</td>
<td>Nonprofit</td>
<td>Community Action Agency (CAA)</td>
<td>Fayette County</td>
</tr>
<tr>
<td>IMPACT Community Action</td>
<td>Nonprofit</td>
<td>Community Action Agency (CAA)</td>
<td>Franklin County</td>
</tr>
<tr>
<td>Gallia-Meigs Community Action Agency, Inc.</td>
<td>Nonprofit</td>
<td>Community Action Agency (CAA)</td>
<td>Gallia County Meigs County</td>
</tr>
<tr>
<td>G-M-N Tri-County Community Action Committee</td>
<td>Nonprofit</td>
<td>Community Action Agency (CAA)</td>
<td>Guernsey County Monroe County Noble County</td>
</tr>
<tr>
<td>Cincinnati/Hamilton County Community Action Agency</td>
<td>Nonprofit</td>
<td>Community Action Agency (CAA)</td>
<td>Hamilton County</td>
</tr>
<tr>
<td>HHWP Community Action Commission</td>
<td>Nonprofit</td>
<td>Community Action Agency (CAA)</td>
<td>Hancock County Hardin County Wyandot County Putnam County</td>
</tr>
<tr>
<td>Highland County Community Action Organization</td>
<td>Nonprofit</td>
<td>Community Action Agency (CAA)</td>
<td>Highland County</td>
</tr>
<tr>
<td>Jackson/Vinton Community Action, Inc.</td>
<td>Nonprofit</td>
<td>Community Action Agency (CAA)</td>
<td>Jackson County Vinton County</td>
</tr>
<tr>
<td>Lifeline for the Empowerment and Development of Consumers, Inc.</td>
<td>Nonprofit</td>
<td>Community Action Agency (CAA)</td>
<td>Lake County</td>
</tr>
<tr>
<td>Ironton/Lawrence County Area Community Action Organization</td>
<td>Nonprofit</td>
<td>Community Action Agency (CAA)</td>
<td>Lawrence County</td>
</tr>
<tr>
<td>LEADS</td>
<td>Nonprofit</td>
<td>Community Action Agency (CAA)</td>
<td>Licking County</td>
</tr>
<tr>
<td>Lorain County Community Action Agency, Inc.</td>
<td>Nonprofit</td>
<td>Community Action Agency (CAA)</td>
<td>Lorain County</td>
</tr>
<tr>
<td>PATHWAY</td>
<td>Nonprofit</td>
<td>Community Action Agency (CAA)</td>
<td>Lucas County</td>
</tr>
<tr>
<td>Organization Name</td>
<td>Type</td>
<td>County/Agency</td>
<td>Location</td>
</tr>
<tr>
<td>-------------------</td>
<td>------</td>
<td>---------------</td>
<td>----------</td>
</tr>
<tr>
<td>Mahoning Youngstown Community Action Partnership (MYCAP)</td>
<td>Nonprofit</td>
<td>Community Action Agency (CAA)</td>
<td>Mahoning County</td>
</tr>
<tr>
<td>Community Action Wayne/Medina</td>
<td>Nonprofit</td>
<td>Community Action Agency (CAA)</td>
<td>Medina County Wayne County</td>
</tr>
<tr>
<td>Miami County Community Action Council</td>
<td>Nonprofit</td>
<td>Community Action Agency (CAA)</td>
<td>Miami County</td>
</tr>
<tr>
<td>Community Action Program Corporation of Washington/Morgan Counties</td>
<td>Nonprofit</td>
<td>Community Action Agency (CAA)</td>
<td>Morgan County Washington County</td>
</tr>
<tr>
<td>Muskingum Economic Opportunity Action Group, Inc. (MEOAG)</td>
<td>Nonprofit</td>
<td>Community Action Agency (CAA)</td>
<td>Muskingum County</td>
</tr>
<tr>
<td>WSOS Community Action Commission, Inc.</td>
<td>Nonprofit</td>
<td>Community Action Agency (CAA)</td>
<td>Ottawa County Sandusky County Seneca County Wood County</td>
</tr>
<tr>
<td>Pickaway County CAO (PICCA)</td>
<td>Nonprofit</td>
<td>Community Action Agency (CAA)</td>
<td>Pickaway County</td>
</tr>
<tr>
<td>Community Action Committee of Pike County</td>
<td>Nonprofit</td>
<td>Community Action Agency (CAA)</td>
<td>Pike County</td>
</tr>
<tr>
<td>Community Action Council of Portage County, Inc.</td>
<td>Nonprofit</td>
<td>Community Action Agency (CAA)</td>
<td>Portage County</td>
</tr>
<tr>
<td>Ross County Community Action Commission, Inc.</td>
<td>Nonprofit</td>
<td>Community Action Agency (CAA)</td>
<td>Ross County</td>
</tr>
<tr>
<td>Community Action Commission of Scioto County</td>
<td>Nonprofit</td>
<td>Community Action Agency (CAA)</td>
<td>Scioto County</td>
</tr>
<tr>
<td>Stark County Community Action Agency</td>
<td>Nonprofit</td>
<td>Community Action Agency (CAA)</td>
<td>Stark County</td>
</tr>
<tr>
<td>Akron/Summit Community Action Inc.</td>
<td>Nonprofit</td>
<td>Community Action Agency (CAA)</td>
<td>Summit County</td>
</tr>
<tr>
<td>Trumbull Community Action Program</td>
<td>Nonprofit</td>
<td>Community Action Agency (CAA)</td>
<td>Trumbull County</td>
</tr>
</tbody>
</table>
SECTION 6
Organizational Standards for Eligible Entities

6.1 **Check the box that applies if using alternative standards:** Development will use the CSBG Organizational Standards Center of Excellence (COE) organization standards (as described in IM 138).

6.2 **If the State is using the COE-developed organization standards, does the State propose making a minor modification to the standards as described in IM 138?** No

6.3 **How will/as the State officiation adopted(ed) organizational standards for eligible entities in the State in a manner consistent with the state’s administrative procedures act?**

<table>
<thead>
<tr>
<th></th>
<th>Regulation</th>
<th>Policy</th>
<th>Contracts with eligible entities</th>
<th>Other, describe</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐</td>
<td></td>
<td>☑</td>
<td>☐</td>
<td></td>
</tr>
</tbody>
</table>

6.4 **How will the State assess eligible entities against organization standards as described in IM 138?**

<table>
<thead>
<tr>
<th></th>
<th>Peer-to-peer review (with validation by the State or State-authorized third party)</th>
<th>Self-assessment (with validation by the State or State-authorized third party)</th>
<th>Self-assessment/peer review with State risk analysis</th>
<th>State-authorized third-party validation</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐</td>
<td></td>
<td>☑</td>
<td></td>
<td></td>
</tr>
<tr>
<td>☐</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>☐</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

6.4a. **Describe the assessment process (for Organizational Standards review).**

- Previously, Development received feedback from eligible entities stating that having 30 days to reply following the receipt of a formal monitoring report was not enough time to collect documentation required to meet the standards (due largely to standards that require board approval). Based on feedback received, Development modified the assessment process to ensure eligible entities had sufficient time to prepare and respond.

- Each CAA receives a full on-site monitoring visit biennially using a monitoring tool that includes the Center of Excellence (COE) CSBG Organizational Standards (as described in IM 138). Eligible entities are provided a copy of the tool in advance of the monitoring visit to allow time to conduct a self-assessment and assemble documentation. During the on-site visit, eligible entities are assessed as “met” or “not met”.

Page 9 of 28
At the conclusion of the on-site visit, during the exit interview, the CAA receives a copy of the completed monitoring tool. By providing a copy of the monitoring tool during the exit interview, the CAA has more time to gather the necessary documentation prior to receiving the formal monitoring report.

- After the on-site visit, a follow up letter and formal monitoring report is sent to the Executive Director, CSBG Coordinator (or equivalent), and the Board of Directors. Development targets sending the monitoring report within 45 days of the visit. This report will indicate if any of the organizational standards were considered “not met” during the monitoring visit, if a response is required, the CAA has 30 days from the receipt of the report to respond.

If applicable, eligible entities have an opportunity to respond and provide evidence of meeting a standard or addressing any other compliance issue(s) subsequent to the monitoring visit. If warranted, a Technical Assistance Plan (TAP) may be established in consultation with the CAA. For eligible entities that do not meet the requirements of the TAP or exhibit greater areas of deficiencies during the monitoring visit, a Quality Improvement Plan (QIP) is established in accordance with 678 C(a) (4) and related guidance from the Federal Office of Community Services.

6.5 Will the State make exceptions in applying the organizational standards for any eligible entities due to special circumstances or organizational characteristics as described in IM 138: No

6.6 Performance Target: What percentage of eligible entities in the State does the State expect will meet all the State-Adopted organization standards in the next year? 90 percent
SECTION 7
State Use of Funds

7.1 Formula: Base plus Formula

7.1a Does the State statutory or regulator authority specify the terms or formula for allocation the 90 percent of funds among eligible entities? Yes

7.2 CARES Funding Allocation Table

<table>
<thead>
<tr>
<th>Grant #</th>
<th>Eligible Entity</th>
<th>Allocation</th>
<th>Counties</th>
</tr>
</thead>
<tbody>
<tr>
<td>01</td>
<td>Adams/Brown Economic Opportunities, Inc.</td>
<td>322,347</td>
<td>Adams, Brown</td>
</tr>
<tr>
<td>02</td>
<td>West Ohio CAP</td>
<td>589,635</td>
<td>Allen, Auglaize, Mercer</td>
</tr>
<tr>
<td>03</td>
<td>Kno-Ho-Co-Ashland Community Action Commission</td>
<td>548,173</td>
<td>Ashland, Coshocton, Holmes, Knox</td>
</tr>
<tr>
<td>04</td>
<td>Ashtabula County Community Action</td>
<td>384,232</td>
<td>Ashatabula</td>
</tr>
<tr>
<td>05</td>
<td>Hocking, Athens, Perry Community Action Agency</td>
<td>541,844</td>
<td>Athens, Hocking, Perry</td>
</tr>
<tr>
<td>07</td>
<td>Community Action Commission of Belmont County</td>
<td>266,406</td>
<td>Belmont</td>
</tr>
<tr>
<td>08</td>
<td>Supports To Encourage Low-Income Families (SELF)</td>
<td>832,061</td>
<td>Butler</td>
</tr>
<tr>
<td>09</td>
<td>Har-Ca-Tus Tri-County Community Action Organization</td>
<td>445,236</td>
<td>Carroll, Harrison, Tuscarawas</td>
</tr>
<tr>
<td>11</td>
<td>Opportunities Industrialization Center of Clark County</td>
<td>453,958</td>
<td>Clark</td>
</tr>
<tr>
<td>12</td>
<td>Clermont County Community Services, Inc.</td>
<td>446,336</td>
<td>Clermont</td>
</tr>
<tr>
<td>13</td>
<td>Clinton County Community Action Program</td>
<td>190,834</td>
<td>Clinton</td>
</tr>
<tr>
<td>14</td>
<td>Community Action Agency of Columbiana County</td>
<td>373,111</td>
<td>Columbiana</td>
</tr>
<tr>
<td>15</td>
<td>Ohio Heartland Community Action Commission</td>
<td>471,566</td>
<td>Crawford, Marion, Morrow</td>
</tr>
<tr>
<td>16</td>
<td>Council for Economic Opportunities In Greater Cleveland</td>
<td>4,611,166</td>
<td>Cuyahoga</td>
</tr>
<tr>
<td>17</td>
<td>Miami Valley Community Action Partnership</td>
<td>2,783,423</td>
<td>Darke, Greene, Montgomery, Preble, Warren</td>
</tr>
<tr>
<td>18</td>
<td>Northwestern Ohio Community Action Commission, Inc.</td>
<td>687,622</td>
<td>Defiance, Fulton, Henry, Paulding, Van Wert, Williams, Migrant Services</td>
</tr>
<tr>
<td>19</td>
<td>Bridges Community Action Partnership</td>
<td>816,276</td>
<td>Delaware, Madison, Union, Champaign, Logan, Shelby</td>
</tr>
<tr>
<td>20</td>
<td>Community Action Commission of Erie/Huron/Richland</td>
<td>811,057</td>
<td>Erie, Huron, Richland</td>
</tr>
<tr>
<td>21</td>
<td>Community Action Program of The Lancaster/Fairfield Area</td>
<td>365,614</td>
<td>Fairfield</td>
</tr>
<tr>
<td>22</td>
<td>Community Action Commission of Fayette County</td>
<td>164,246</td>
<td>Fayette</td>
</tr>
<tr>
<td>23</td>
<td>IMPACT Community Action</td>
<td>3,617,149</td>
<td>Franklin</td>
</tr>
<tr>
<td>24</td>
<td>Community Action Program of Meigs &amp; Gallia Counties, Inc.</td>
<td>261,007</td>
<td>Gallia, Meigs</td>
</tr>
<tr>
<td>25</td>
<td>LEDC (Temporary Provider)</td>
<td>197,876</td>
<td>Geauga</td>
</tr>
<tr>
<td>26</td>
<td>G-M-N Tri-County Community Action Committee</td>
<td>277,668</td>
<td>Guernsey, Monroe, Noble</td>
</tr>
<tr>
<td>27</td>
<td>Cincinnati/Hamilton Community Action Agency</td>
<td>2,676,107</td>
<td>Hamilton</td>
</tr>
<tr>
<td>28</td>
<td>HHWP Community Action Commission</td>
<td>437,987</td>
<td>Hancock, Hardin, Putnam, Wyandot</td>
</tr>
<tr>
<td>29</td>
<td>Highland County Community Action Organization</td>
<td>216,214</td>
<td>Highland</td>
</tr>
<tr>
<td>30</td>
<td>Jackson/Vinton Community Action, Inc.</td>
<td>247,794</td>
<td>Jackson, Vinton</td>
</tr>
<tr>
<td>31</td>
<td>Jefferson County Community Action Council, Inc.</td>
<td>335,312</td>
<td>Jefferson</td>
</tr>
<tr>
<td>32</td>
<td>Lifeline for Empowerment &amp; Development of Consumers, Inc.</td>
<td>445,254</td>
<td>Lake</td>
</tr>
<tr>
<td>33</td>
<td>Ironton/Lawrence County Area Community Action Organization</td>
<td>296,831</td>
<td>Lawrence</td>
</tr>
<tr>
<td>34</td>
<td>LEADS</td>
<td>437,654</td>
<td>Licking</td>
</tr>
<tr>
<td>35</td>
<td>Lorain County Community Action Agency, Inc.</td>
<td>715,533</td>
<td>Lorain</td>
</tr>
<tr>
<td>36</td>
<td>PATHWAY</td>
<td>1,677,187</td>
<td>Lucas</td>
</tr>
</tbody>
</table>
7.3. **Distribution Process:** Describe the specific steps in the State's process for distributing 90 percent funds to the Eligible Entities and include the number of days each step is expected to take; include information about State legislative approval or other types of administrative approval (such as approval by a board or commission).

2.5 percent will be allocated to administrative activities. Our State Association partner, the Ohio Association of Community Action Agencies (OACAA) will be allocated 4.5 percent to continue to support their efforts in assisting the local CAAs with their fight against poverty. The impact of COVID-19 has further burdened Ohio’s communities with additional economic difficulties and lack of resources and in response, OACAA will create innovative training programs and readily available resources that focus on launching recovery efforts throughout the state. The remaining 93 percent is distributed to local CAAs as follows: Applications for funding for CSBG CARES grants are submitted to Development in accordance with applicable policies and procedures. Applications are submitted electronically and reviewed by an assigned Field Representative (Community Development Analyst). This first comprehensive review takes about one work week per CAA application, on average. However, many variables outside of the state lead agency’s control impact the time required, including, among others, the completeness and quality of the applications submitted and the size of the CAA and the number of community services programs the CAA operates. Once the initial review is complete, the Section Manager, Fiscal staff, Fiscal Manager, Asst. Deputy Chief, and Deputy Chief review the applications. Final approval of the applications is provided by Development’s Director. Development staff upload fully executed grant agreements to the electronic grant management system where they can be accessed by eligible entities for signature. Funds equivalent to three months of the 12-month grant allocation can then be advanced to eligible entities.

7.4 **Distribution Timeframe:** Does the State plan to make funds available to eligible entities no later than 30 calendar days after OCS distributes the Federal award? Yes
7.5. **Performance Management Adjustment:** How is the State improving grant and/or contract administration procedures under this State Plan as compared to past plans? Any improvements should be based on analysis of past performance, and should consider feedback from Eligible Entities, OCS, and other sources, such as the public hearing. If the State is not making any improvements, provide further detail.

- In the 2018-2019 grant application, Development changed the application process as a result of feedback received from eligible entities and in response to the recently approved federal annual report (replacing the Information Survey Report). Feedback from eligible entities stated that: the previous application process was time-consuming, it was not clear what areas within the plan were reported on a federal level, and the system itself was not user-friendly. Development, in partnership with OACAA, solicited volunteers from Ohio’s CSBG network to review the new grant application and subsequent reporting process to ensure all the information required in the federal annual report was captured in an efficient and meaningful manner. The new grant application was launched in October 2017.
- Ohio’s CSBG grant applications operate on a calendar year basis, and throughout the year, Development provides additional listening sessions and opportunities for CAAs to provide feedback on the State Plan development and other CSBG related areas. Development also launched a website specifically for program providers. The website provides CAAs tools and resources in each program area. For the upcoming 2020 grant cycle, Development is further updating the application process based on additional feedback received from the CSBG network. These updates include a streamlined budget revision process, a clearer process to identify how CSBG funds are utilized to provide services and a streamlined budget.

7.6 What amount of State CSBG funds does the State plan to allocate for administrative activities, under this state plan? 4.5 percent

7.7 How many State staff positions will be funded in whole or in part with CSBG funds under this State Plan? 23

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

7.9 Does the State have remainder/discretionary funds? Yes
7.10 What types of organizations, if any, does the State plan to work with (by grant or contract using remainder/discretionary funds) to carry out some or all of the activities in table 7.9 [Check all that apply and narrative where applicable]

☒ CSBG eligible entities (if checked, include the expected number of CSBG eligible entities to receive funds): 15
☒ Other community-based organizations
☒ State Community Action Association
☐ Regional CSBG technical assistance provider
☐ National technical assistance provider
☐ Individual consultant (s)
☐ Tribes and Tribal Organizations
☐ Other
☐ None

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

- Development will make discretionary funds available to eligible entities to increase the agency’s ability to meet the needs of the CSBG eligible population within their communities. Discretionary funds could address emergency situations such as natural disaster relief or emergency assistance for eligible customers such as water or utility assistance.

SECTION 8
State Training and Technical Assistance

8.1 Describe the State’s Plan for delivering CSBG-funded training and technical assistance to eligible entities under this State plan by completing the table below:

- Development will coordinate with eligible training and technical assistance agencies to develop a training plan to meet the needs of all 47 Community Action Agencies.

8.2 Does the State have in place Technical Assistance Plans (TAPs) or Quality Improvement Plans (QIPs) for all eligible entities with unmet organizational standards that could be used if appropriate? Yes
8.3 Indicate the types of organizations through which the State plans to provide training and/or technical assistance as described in item 8.1, and briefly describe their involvement [Check all that applies and narrative where applicable]
☑ CSBG eligible entities (if checked, include the expected number of CSBG eligible entities to receive funds): 15
☑ Other community-based organizations
☑ State Community Action Association
☐ Regional CSBG technical assistance provider
☐ National technical assistance provider
☐ Individual consultant (s)
☐ Tribes and Tribal Organizations
☐ Other
☐ None

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

- As a result of the 2019 Ohio CSBG Program Survey, Development will provide CAAs assistance meeting the Organizational Standards to continue to improve their Organizational Standards scores. The CAAs have requested training and technical assistance on the required documentation listed on the monitoring tool as well as further review of the monitoring tool itself. Development has created a training tool and held sessions at the biannual OACAA conferences on organizational standards topics such as board composition and supporting documentation. Development also will provide training on our updated database. In 2017, Development implemented a new database for CAAs to complete their grant application and submit quarterly and annual reports. Development works with CAAs individually to check on compatibility issues and gather feedback on reporting and data verification. Development held a training session for all Ohio eligible entities in the Fall of 2019 to review the system updates in preparation for the 2020-2021 grant cycle. Development will continue to hold listening sessions and opportunities for CAA’s to provide feedback on the State Plan development and other CSBG related areas. Also, in addition to listening sessions, Development will:
  o Coordinate with OACAA to provide additional comprehensive program training.
  o Update and release the CSBG Policy and Procedures manual.
  o Create an internal monitoring manual for Development monitoring staff.

The training opportunities will result in a consistent message for the network regarding monitoring and programmatic compliance. The updated CSBG Policy and Procedures manual will ensure all agencies are aware of federal and state regulations regarding CSBG. The internal monitoring manual will ensure consistency in monitoring by Development.
9.1 State Linkages and Coordination at the State Level: *Describe the linkages and coordination at the State level that the State plans to create or maintain to ensure increased access to CSBG services to low-income people and communities under this State Plan and avoid duplication of services (as required by the assurance under Section 676(b)(5)).*

☒ State Low Income Home Energy Assistance Program (LIHEAP) office
☒ State Weatherization office
☐ State Temporary Assistance for Needy Families (TANF) Office
☐ State Head Start Office
☐ State Public Health Office
☒ State education department
☒ State Workforce Innovation and Opportunity Act (WIOA) agency
☐ State Budget Office
☒ State housing office
☐ Supplemental Nutrition Assistance Program
☐ State child welfare office
☒ Other

Development administers CSBG, LIHEAP (HEAP), HWAP, state-funded energy assistance and efficiency programs, the DOE-funded State Energy Program and other programs designed to meet multiple needs and improve the living conditions of Ohio citizens. Most (though not all) Ohio eligible entities operate this entire slate of programs locally. In addition, the Community Services Division contains the Office of Community Development (OCD) that administers funds directed to the provision of housing and prevention of homelessness; many Ohio CAAs are also subgrantees of OCD. Representatives of other state agencies, such as the Departments of Education and Aging and state workforce agency serve on/or participate in CSBG Advisory Committee meetings hosted by Development.

9.2 State Linkages and Coordination at the Local Level: *Describe the linkages and coordination at the local level that the State and eligible entities plan to create or maintain to ensure increased access to CSBG services to low-income people and communities and avoid duplication of services, as described under Section 675C(b)(B) and as required by assurance under Sections 676(b)(5) of the CSBG Act.*

- Development reviews and tracks agency partnerships as part of the online CSBG grant applications (Community Action Plans) submitted by CAAs. Projects that involve multiple funding streams are described in the grant applications along with the nature of those partnerships and the proposed activities.
- In addition, CAAs customarily retain board members representing key interests in their service territories. The broad makeup of board member enables regular exchange of information, coordination and co-funding of projects directed to households that are eligible for services provided by multiple programs.
9.3. Eligible Entity Linkages and Coordination

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

- Development reviews the CSBG grant applications which require the CAAs to describe how they will coordinate and establish linkages within their communities. Development also reviews the CAAs needs assessment during the CSBG grant review process and during the on-site monitoring visit. The needs assessment is required to identify needs within the community and how those needs are met either directly or through coordination with other entities to ensure no duplication of services.

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

- Development requires eligible entities to demonstrate how referrals made to eligible customers result in assistance being provided to that customer. Eligible entities must create processes in order to capture this data in their CSBG grant application and reporting. By encouraging appropriate follow-up, it can be better documented when referrals result in assistance or a benefit being provided to the customer.

9.4. Workforce Innovation and Opportunity Act (WIOA) Employment and Training Activities: Does the State intend to include CSBG employment and training activities as part of a WIOA Combined State Plan, as allowed under the Workforce Innovation and Opportunity Act (as required by the assurance under Section 676(b)(5) of the CSBG Act)? No

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

- Development and the Office of Workforce Development at the Ohio Department of Job and Family Services (ODJFS) are working together to develop a common understanding of workforce transformation and development needs to assure there is not a duplication of services. The Office of Workforce Development also participates in CSBG Advisory Committee meetings.

9.5. Emergency Energy Crisis Intervention: Describe how the State will assure, where appropriate, that emergency energy crisis intervention programs under title XXVI (relating to Low-Income Home Energy Assistance) are conducted in each community in the State, as required by the assurance under Section 676(b)(6) of the CSBG Act.)
Development administers LIHEAP and its Winter Crisis and Summer Crisis components. Through Development’s oversight, local energy assistance providers (most of them CAAs) are required to deliver energy assistance benefits on an emergency basis in strict conformance with Development’s energy assistance guidelines.

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

- Information on partnerships and collaborations, (including those with faith-based, charitable groups and community organizations) is submitted to Development by CAAs as part of their CSBG Application (Community Action Plan). The plans are reviewed and approved by Development. Such local organizations are also represented on CAA tri-partite boards.

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

- CAAs coordinate through referrals, information sharing, and by subcontracting with other community organizations to provide the programs, services, and benefits identified through their service territory needs assessments. Such coordination is reflected in the CSBG grant application (Community Action Plan) and reported on a quarterly basis as part of agency workplans. Many Ohio CAAs were previously Ohio Benefit Bank sites where customers used an online system to identify available programs and services. This program was discontinued July 31, 2019. Many Ohio CAAs currently provide referrals to the ODJFS Ohio Benefits system. These efforts assure that CAA are coordinating CSBG funds with other public and private resources.

9.8. **Coordination among Eligible Entities and State Community Action Association:**

Describe State activities for supporting coordination among the Eligible Entities and the State Community Action Association.

- Development provides funding to the OACAA to conduct two statewide conferences attended by CAAs, provides technical assistance to agencies in need, and communicates with agencies on issues of interest locally and statewide, among other activities and initiatives. In partnership with OACAA, Development created a working group of CSBG Coordinators from CAAs throughout Ohio that provides feedback on the development of the CSBG Grant Application (Community Action Plan) and training materials.
9.9 Communication with Eligible Entities and the State Community Action Association: In the table below, describe the State's plan for communicating with Eligible Entities, the State Community Action Association, and other partners under this State Plan. Include communication about annual hearings and legislative hearings, as described under Section 4, CSBG Hearing Requirements.

<table>
<thead>
<tr>
<th>Topic</th>
<th>Expected Frequency</th>
<th>Format</th>
<th>Brief Description of Other</th>
</tr>
</thead>
<tbody>
<tr>
<td>Development routinely communicates with the OACAA and Eligible Entities</td>
<td>Other</td>
<td>Other</td>
<td>Methods include: information updates, email blasts, posting on the state website, one-on-one leadership meetings, visits to Eligible Entities, attendance at monthly OACAA board meetings, CSBG Advisory Committee meetings, presentations at Association conferences sponsored by the state lead agency, and, single-purpose meetings involving Eligible Entities and the OACAA. An example is the one-day meeting on CSBG Organizational Standards that took place on October 19, 2017 and a two-day meeting planned for September 2019.</td>
</tr>
<tr>
<td>Grant application training</td>
<td>Annually</td>
<td>In-person/webinar</td>
<td></td>
</tr>
<tr>
<td>CSBG Hearings/mtgs</td>
<td>Annually</td>
<td>Other</td>
<td>In-person meeting</td>
</tr>
<tr>
<td>ROMA reporting</td>
<td>Quarterly</td>
<td>Email</td>
<td>Posting in electronic grant management system</td>
</tr>
<tr>
<td>Development Updates</td>
<td>Semi-Annually</td>
<td>Meetings/Presentation</td>
<td></td>
</tr>
<tr>
<td>Program information</td>
<td>Other</td>
<td>Website</td>
<td>As warranted</td>
</tr>
<tr>
<td>Guidance</td>
<td>Other</td>
<td>Email</td>
<td>As warranted</td>
</tr>
<tr>
<td>Provider Website Updates</td>
<td>As needed</td>
<td>Online</td>
<td>As warranted</td>
</tr>
<tr>
<td>OACAA Newsletter</td>
<td>Monthly</td>
<td>Online</td>
<td>OACAA creates a monthly newsletter to send to eligible entities to provide updates on programs throughout Ohio and as an opportunity to spotlight upcoming training and events</td>
</tr>
<tr>
<td>OACAA-Blog</td>
<td>Monthly</td>
<td>Online</td>
<td>OACAA publishes a blog monthly geared towards eligible entities with varying topics</td>
</tr>
<tr>
<td>OACAA Social Media</td>
<td>As needed</td>
<td>Online</td>
<td>OACAA utilizes various social media pages to publicize events, newsletters and various topics of interest to eligible entities</td>
</tr>
</tbody>
</table>
9.10. back to Eligible Entities and State Community Action Association: *Describe how the State will provide feedback to local entities and State Community Action Associations regarding performance on State Accountability Measures.*

- If feedback is received by Development from OCS, Development will share information with eligible entities and the State Community Action Association within 60 days of receiving feedback from OCS.

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

- In response to feedback received from CAAs, Development continues to work to increase communication to eligible entities. Examples include: a social media calendar and news release template, and development of a specific provider website where CAAs can find tools and resources in each program area. Development has focused on regional listening sessions to receive feedback on the State Plan. The 2019 CSBG Program Survey results have been analyzed by the Development and a plan to address organizational standards training and the new database has been developed. Additional training opportunities and an updated policy manual will further ensure agencies are aware of all federal and state regulations regarding CSBG.
SECTION 10
Monitoring, Corrective Action, and Fiscal Controls

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

Full on-site visit for each agency during the second and third quarter of the 2021.

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

10.3 Initial Monitoring Reports: According to the State's procedures, by how many calendar days must the State disseminate initial monitoring reports to local entities? 45 days

10.4 Closing Findings: Are State procedures for addressing eligible entity findings/deficiencies and documenting the closure of findings, included in the State monitoring protocols attached above? No

10.5 Quality Improvement Plans (QIPs): How many eligible entities are currently on Quality Improvement Plans? None

10.6 Reporting of QIPs: Describe the State's process for reporting eligible entities on QIPs to the Office of Community Services within 30 calendar days of the State approving a QIP: Within 30 days of approving a QIP, Development will notify the assigned project officer at the HHS Office of Community Services (OCS).

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

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

10.8a If yes, provide the citation(s) of the law and/or regulation. If no, describe State procedures for the designation of new eligible entities. Ohio Revised Code (ORC) 122.69 and 122.701
10.9 Does the State CSBG statute and/or regulations provide for de-designation of eligible entities? Yes

10.9a If yes, provide the citation(s) of the law and/or regulation. If no, describe State procedures for de-designation of eligible entities. Ohio Revised Code (ORC) 122.701

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

10.10a If yes, provide the citation(s) of the law and/or regulation. If no, describe State procedures for re-designation of existing eligible entities. ORC 122.69 and 122.701

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

- The financial reporting process and controls preparation of SF425 are listed below: 1. All invoices are reviewed and approved by Development’s Fiscal Manager. 2. Once reviewed, invoices are submitted to the Ohio Administrative Knowledge System (OAKS, the State of Ohio Accounting System) 3. The reporting tool Cognos is used as a data warehouse to create reports from the OAKS system. 4. Development staff then prepares a final financial report excel spreadsheet based upon Cognos data and submits this information to Development staff (Fiscal Manager, Program Manager, Assistant Deputy Chief) for final review and approval. 5. Once approved, staff enter the information into the HHS OLDC Financial Portal.

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

- Development’s Audit Office receives single audit reports from grantees awarded Community Services Block Grant (CSBG) funds. Within six months of receipt, each audit report is reviewed. The review includes verification of required schedules and reports, review and analysis of the financial statements and evaluation of any audit findings. If an audit does not contain findings and the financial reports are acceptable, the Audit Office issues correspondence closing the audit. When an audit contains findings related to Development grants the
Audit Office issues a correspondence requiring a Corrective Action Plan and notifies Development staff. If the Corrective Action Plan is found acceptable, the Audit Office issues correspondence accepting the plan and closing the audit report. If the Corrective Action Plan is not submitted or is not acceptable, the Audit Office requests additional information until it is found acceptable. If the Corrective Action Plan is not acceptable, Development’s Audit Office will notify Development and recommend that all current grant reimbursements be placed on hold until the grantee complies. At that time, Development will determine if reimbursements will be withheld and if special conditions should be placed on the grant in order to protect federal funds.

10.13 Assurance on Federal Investigations:
Will the State "permit and cooperate with Federal investigations undertaken in accordance with Section 678D(a)" of the CSBG Act, as required Yes

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

- The current State Plan indicates that Development will conduct an on-site monitoring visit every other year. Development has determined that in emergency situations in the best interest of Development staff, CAAs and clients, onsite monitoring will not occur. Due to the current COVID-19 pandemic, guidance provided in CSBG -IM-2020-157 and local State safety guidelines, Development will not conduct an on-site monitoring visit in 2020 as scheduled. All on-site monitoring will reconvene in 2021. This adjustment will allow Development to still meet the CSBG requirement of conducting on-site visits of eligible entities every three (3) years. Development will develop a desk review process in order to provide CSBG grant oversight remotely during the COVID-19 pandemic. Development will send each eligible entities a copy of the desk review tool, a list of items to submit thru a secure website along with submission instructions. Development will review all items and schedule a conference call to review the desk review results and provide training and technical assistance if necessary. A copy of the desk review tool will be provided to the CAA.

- The current monitoring process for organizational standards will not be adjusted as it provides sufficient oversee. Development will incorporate client file review as a separate part of the on-site and desk review process to ensure client information is obtained, income is calculated correctly, and benefits are being distributed correctly. Additional training opportunities and an updated policy manual will help ensure agencies are aware of all federal and state regulations regarding CSBG.
SECTION 11
Eligible Entity Tripartite Board

11.1 Which of the following measures are taken to ensure that the State verifies CSBG Eligible Entities are meeting Tripartite Board requirements under Section 676B of the CSBG Act? [Check all that applies and narrative where applicable]
☐ Attend Board Meetings
☒ Review copies of Board meeting minutes
☒ Keep a register of Board vacancies/composition
☒ Other: As needed, Development will provide training during eligible entities board meetings in consultation with Development’s legal office.

11.2 How often does the State require eligible entities (which are not on TAPs or QIPs) to provide updates (e.g., copies of meeting minutes, vacancy alerts, changes to bylaws, low-income member selection process, etc.) regarding their Tripartite Boards?[Check all that applies and narrative where applicable]
☐ Annually
☐ Semiannually
☐ Quarterly
☐ Monthly
☒ Other: CAAs are required to submit a board roster with their biennial CSBG grant applications and provide Development with a revised board roster whenever changes occur.

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

- CAA Board Policies and Manuals (or by-laws) are reviewed every other year as part of full on-site reviews. Development also reviews each CAA board appointment letters and requests a roster of the Board of Directors be sent to Development whenever changes occur.

11.4 Does the State permit public eligible entities to use, as an alternative to a Tripartite Board, "another mechanism specified by the State to assure decision-making and participation by low income individuals in the development, planning, implementation, and evaluation of programs" as allowed under Section 676B(b)(2) of the CSBG Act: No
SECTION 12
Individual and Community Income Eligibility Requirements

12.1 Required Income Eligibility: What is the income eligibility threshold for services in the State? 200% percent of the HHS poverty line

12.1a. Describe any State policy and/or procedures for income eligibility, such as treatment of income and family/household composition. See attached CSBG Policy and Procedures Manual

12.2. Eligibility for General/Short-Term Services:
For services with limited in-take procedures (where individual income verification is not possible or practical), how does the State ensure Eligible Entities generally verify income eligibility for services? An example of these services is emergency food assistance.

- Census tract data may be utilized to demonstrate the incidence of poverty in the community where the emergency service is being provided. Proxy eligibility determinations could be used for those with a card or identification showing they are receiving TANF or other government-provided social services, for example.

12.3. Community-targeted Services:
For services that provide a community-wide benefit (e.g., development of community assets/facilities, building partnerships with other organizations), how does the State ensure Eligible Entities' services target and benefit low-income communities?

- In cases where a community-wide benefit is being provided, Development would require eligible entities to utilize census tract data or other relevant data to document the incidence of poverty in the target area.
SECTION 13
RESULTS ORIENTED MANAGEMENT AND ACCOUNTABILITY (ROMA) SYSTEM

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

☒ The Results Oriented Management and Accountability (ROMA) System
☐ Another performance management system that meets the requirements of section 678(b) of the CSBG act
☐ An alternative system for measuring performance results

13.1 a If ROMA was selected in Item 13.1, attach and/or describe the State's written policies, procedures, or guidance documents on ROMA. See attached CSBG Policy and Procedure Manual

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

☒ CSBG National Performance Indicators (NPIs)
☐ NPIs and Others
☐ Others

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

• Development provides training and instruction on the Results-Oriented Management and Accountability (ROMA) system as part of each two-year grant application process. ROMA training is also available through OACAA’s training and technical assistance grant with the Ohio Community Action Training Organization (OCATO). OCATO is the training affiliate of the OACAA. OCATO has a certified ROMA Trainer on staff. There are currently two (2) certified ROMA trainers among Ohio’s eligible entities. OCATO is currently working to coordinate an effort to create Certified ROMA Implementers throughout Ohio.
13.4. **Eligible Entity Use of Data:**

How is the State validating that the Eligible Entities are using data to improve service delivery?

- Development reviews each CAAs CSBG grant application (Community Action Plan) and the community needs assessment. Each community needs assessment contains data on the territory being served. This data may include demographic information of the low-income population, needs assessed by the low-income and community and resources that are being provided by the CAA and other agencies within that community. By understanding the top needs within that community, Development Field Representatives can understand how the Community Action Plan is structured so programs are designed to meet those needs. Additionally, Development Field Representatives consult with local agencies on program outcomes and to what extent the outcomes suggest that changes should be made to the Community Action Plan. Such consultations may occur at the time CSBG grant applications are submitted, when program revisions are submitted to Development for review and approval, and when quarterly ROMA reporting is taking place.

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

- Development requires each CAA to submit a CSBG grant application every two years. This CSBG grant application is what Ohio considers the Community Action Plan. The grant application is amended, and a new approval process takes place when program areas or budget information is changed.

13.6. **Assurance:**

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

- Eligible entities are required to undertake a community needs assessment at least every three (3) years and provide a summary of the current assessment to Development as part of its two-year CSBG application. It is also expected that community needs assessments will be updated if there are major changes in a service area that impact the needs of target populations. An example would be a loss of a major employer or a natural disaster.
SECTION 14
CSBG Programmatic Assurances and Information Narrative (section 676 (b) of the CSBG Act)

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

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

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

(ii) to secure and retain meaningful employment;

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

(iv) to make better use of available income;

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

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

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

- document best practices based on successful grassroots intervention in urban areas, to develop methodologies for widespread replication; and strengthen and improve relationships with local law enforcement agencies, which may include participation in activities such as neighborhood or community policing efforts;

- Local coordination with social services delivery systems and the private sector is encouraged when planning and implementing programs. Eligible entities will submit applications and community services workplans specifically designed to implement the above assurances. Development staff will review the application for adherence to these assurances. At the State level, staff efforts to coordinate with other providers of social services to low-income Ohioans will continue and new opportunities will be explored.
14.1 b. 676(b)(1)(B) Describe how the State will assure "that funds made available through grant or allotment will be used –

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

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

- CAA applications for the 2020-2021 CSBG program will include a place to indicate whether program(s) address the needs of youth in low-income communities. Quarterly ROMA reports also provide documentation. Partnerships may also provide documentation of programs to address the needs of youth in low-income communities.

14.1 c. 676(b)(1)(C) Describe how the State will assure "that funds made available through grant or allotment will be used –(C) to make more effective use of, and to coordinate with, other programs related to the purposes of this subtitle (including State welfare reform efforts)

- Local coordination with social services delivery systems and the private sector is encouraged and documented as eligible entities plan and operate programs. Coordination efforts are described in CSBG grant applications submitted to Development. The CSBG Advisory Committee has been expanded to include the Office of Workforce Development at the Ohio Department of Job and Family Services.

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

- As part of the biennial application for CSBG funding, the State of Ohio requires all agencies to submit a CSBG grant application (Community Action Plans) that detail services to be provided and budgeted expenses. Such plans may and do include projects and initiatives pertaining to coordination and innovative community-based initiatives. Agencies may also apply for T&TA funds for special projects in some cases.

- Designated CAAs are providing services on a stand-alone basis or in partnership with other local public and private entities in all 88 Ohio counties.
14.3. 676(b)(3)(D) Describe "how the local entity will use the funds [made available Under Section 675C(a)] to support innovative community and neighborhood-based initiatives related to the purposes of this subtitle, which may include fatherhood initiatives and other initiatives with the goal of strengthening families and encouraging parenting."

- Each of Ohio’s designated eligible entities submits the above information for its service area as a part of the two-year CSBG grant application. Eligible entities will report in the revised annual report format, utilizing the national performance indicators and community level data.

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

- Development will continue to use a CSBG grant application which contains work plans for emergency and nutrition services. Ohio CAAs typically provide more nutrition-related services than any other type of assistance, except for emergency services. It is expected that this level of service will continue.