

# WEST VIRGINIA STATE PLAN

## Community Services Block Grant Fiscal Year 2013

### I. Federal Fiscal Year Covered by this State Plan and Application

This State Plan is for the Federal fiscal year 2013 only.

### II. Letter of Transmittal to the Office of Community Services

### III. Executive Summary

#### A. CSBG State Legislation: Not Applicable

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

The West Virginia Office of Economic Opportunity (OEO) has been designated by the Governor of West Virginia to act as the lead agency for the administration of the Community Services Block Grant (CSBG). The current governor is Governor Earl Ray Tomblin.

##### Designated State Agency:

West Virginia Office of Economic Opportunity

##### Director:

Ms. Julie A. Alston

#### C. Public Hearing Requirements

- (1) **Public Hearing:** Public Hearing on the 2013 State Plan was held on August 23, 2011 in the second floor conference room, 700 Washington Street East, Charleston, WV 25301 at 2:00pm. Notice of the meeting was provided to the community action network, through emails and to the public through legal advertisements in eight regional newspapers of general distribution. The State Plan is also available on <http://www.goeo.wv.gov>, the OEO website.

Appendix A.1 – Public Hearing Minutes, August 23, 2011

Appendix A.2 – List of Public Hearing attendees

- (2) **Legislative Hearing:** The WV Office of Economic Opportunity addressed the Joint Finance Committee of the West Virginia Senate and the House of Delegates on January 11, 2012. Notice of meeting was provided to the community action network and made available to the public through the legislative public announcements.

- (3) **Public Inspection of State Plan:** The West Virginia CSBG State Plan for FFY 2013 was made available for public comment during the time period of August 8, 2012 through August 23, 2012. The State Plan was posted on the OEO website [http: www.goeo.wv.gov/](http://www.goeo.wv.gov/) and notification of said posting distributed to the 16 Community Action Agencies (CAA's) for their comments. The public was notified of the availability of the plan through advertisements in eight newspapers of general distribution in West Virginia.

Appendix A.4 – Notification of Plan Availability for Comment

Appendix A.5 – List of newspapers and dates of publication

#### **IV. Statement of Federal and CSBG Assurances**

As part of West Virginia's annual application and plan required by Section 676 of the Community Service Block Grant Act as amended (42 U.S.C. 9901 et seq) (The Act), the Office of Economic Opportunity, the designee of the chief executive office of the state hereby agrees to the Assurances in Section 676 of the Act.

##### **A. Programmatic Assurances**

- (1) Funds made available through this grant allotment will be used:
- (a) To support activities that are designed to assist low-income families and individuals, including families and individuals receiving assistance under part A of title IV of the Social Security Act (42 U.S.C. 601 et seq.), homeless families and individuals, migrant or seasonal farm workers, and elderly low-income individuals and families to enable the families and individuals to:
    - (i) remove obstacles and solve problems that block the achievement of self-sufficiency (including self-sufficiency for families and individuals who are attempting to transition off a State program carried out under part A of title IV of the Social Security Act);
    - (ii) secure and retain meaningful employment;
    - (iii) attain an adequate education, with particular attention toward improving literacy skills of low-income families in the communities involved, which may include carrying out family literacy initiatives;
    - (iv) make better use of available income;
    - (v) obtain and maintain adequate housing and a suitable living environment;
    - (vi) obtain emergency assistance through loans, grants, or other means to meet immediate and urgent family and individual needs; and
    - (vii) 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;

- (b) To address the needs of youth in low-income communities through youth development programs that support the primary role of the family, give priority to the prevention of youth problems and crime, and promote increased community coordination and collaboration in meeting the needs of youth, and support development and expansion of innovative community-based youth development programs that have demonstrated success in preventing or reducing youth crime, such as 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 entrepreneur programs); and after school child care programs; and
- (c) To make more effective use of, and to coordinate with, other programs (including State welfare reform efforts). [676(b)(1)]

(2) To describe how the State intends to use discretionary funds made available from the remainder of the grant or allotment described in Section 675C(b) of the Act in accordance with the Community Services Block Grant Program, including a description of how the State will support innovative community and neighborhood-based initiatives related to the purposes of the Community Services Block Grant Program; [676(b)(2)]

(3) To submit information provided by eligible entities in the State, including:

- (a) a description of the service delivery system, for services provided or coordinated with funds made available through grants made under Section 675C(a) of the Act, targeted to low-income individuals and families in communities within the State:
- (b) a description of how linkages will be developed to fill identified gaps in services, through the provision of information, referrals, case management, and follow-up consultations;
- (c) a description of how funds made available through grants made under Section 675(a) will be coordinated with other public and private resources; and,

- (d) a description of how local entities will use the funds to support innovative community and neighborhood-based initiatives related to the purposes of the Community Services Block Grant, which may include fatherhood initiatives and other initiatives with the goal of strengthening families and encouraging effective parenting. [‘676(b)(3)]
- (4) To ensure 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.[‘676(b)(4)]
- (5) That the State and the eligible entities in the State will coordinate, and establish linkages between, governmental and other social services programs to assure the effective delivery of such services to low-income individuals and to avoid duplication of such services. The State and the eligible entities will coordinate the provision of employment and training activities in the State and in communities with entities providing activities through statewide and local workforce investment systems under the Workforce Investment Act of 1998;[‘676(b)(5)]
- (6) To ensure coordination between antipoverty programs in each community in the State, and ensure, where appropriate, that emergency energy crisis intervention programs under title XXVI (relating to low-income home energy assistance) are conducted in such communities; [‘676(b)(6)]
- (7) To permit and cooperate with federal investigations undertaken in accordance with section 678D of the Act; [‘676(b)(7)]
- (8) That any eligible entity in the State that received funding in the previous fiscal year through a Community Services Block Grant under the community services block grant program will not have its funding terminated under this subtitle, or reduced below the proportional share of funding the entity received in the previous fiscal year unless, after providing notice and an opportunity for a hearing on the record, the State determines that cause exists for such termination or such reduction, subject to review by the Secretary as provided in Section 678C(b) of the Act.[‘676(b)(8)]
- (9) That the State and eligible entities in the State will, to the maximum extent possible, coordinate programs with and form partnership with other organizations serving low-income residents of the communities and members of the groups served by the State, including religious organizations, charitable groups, and community organizations. [‘676(b)(9)]
- (10) To require each eligible entity in the State to establish procedures under which a low-income individual, community organization, or religious organization, or representative of low-income individuals that considers its organization, or low-income individuals, to be inadequately represented on

the board (or other mechanism) of the eligible entity to petition for adequate representation. ['676(b)(10)]

- (11) To secure from each eligible entity in the State, as a condition to receipt of funding, a CSBG Application which shall be submitted to the Secretary, at the request of the Secretary, with the State plan that includes a community needs assessment for the community served, which may be coordinated with community-needs assessments conducted for other programs; ['676(b)(11)]
- (12) That the State and all eligible entities in the State will, not later than fiscal year 2001, participate in the Results Oriented Management and Accountability System, a performance measure system for which the Secretary facilitated development pursuant to Section 678E(b) of the Act. ['676(b)(12)]
- (13) To provide information describing how the State will carry out these assurances. ['676(b)(13)]

**B. Administrative and Financial Assurances**

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

- (1) To submit an application to the Secretary containing information and provisions that describe the programs for which assistance is sought under the community services block grant program prepared in accordance with and containing the information described in Section 676 of the Act. ['675A(b)]
- (2) To use not less than 90 percent of the funds made available to the State by the Secretary under Section 675A or 675B of the Act to make grants to eligible entities for the stated purposes of the Community Services Block Grant Program and to make such funds available to eligible entities for obligation during the fiscal year and the succeeding fiscal year, subject to the provisions regarding recapture and redistribution of un-obligated funds outlined below. ['675C(a)(1) and (2)]
- (3) In the event that the State elects to recapture and redistribute funds to an eligible entity through a grant made under Section 675C(a)(1) when un-obligated funds exceed 20 percent of the amount so distributed to such recaptured funds to an eligible entity, or require the original recipient of the funds to redistribute the funds to a private, nonprofit organization, located within the community served by the original recipient of the funds, for activities consistent with the purposes of the Community Services Block Grant Program. ['675C (a)(3)]
- (4) To spend no more than the greater of \$55,000 or 5 percent of its grant received under Section 675A of the State allotment received under section 675B for administrative expenses, including monitoring activities. ['675C(b)(2)]

- (5) In states with a charity tax credit in effect under state law, the State agrees to comply with the requirements and limitations specified in Section 675 C regarding use of funds for statewide activities to provide charity tax credits to qualified charities whose predominant activity is the provision of direct services within the United States to individuals and families whose annual incomes generally do not exceed 185 percent of the poverty line in order to prevent or alleviate poverty among such individuals and families. [‘675C]
- (6) That the lead agency will hold at least one hearing in the State with sufficient time and statewide distribution of notice of such hearing, to provide to the public an opportunity to comment on the proposed use and distribution of funds to be provided through the grant or allotment under Section 675A or ‘675B for the period covered by the State plan. [‘676(a)(2)(B)]
- (7) That the chief executive officer of the State will designate an appropriate State agency for purposes of carrying out State Community Services Block Grant Program activities. [‘676(a)(1)]
- (8) To hold at least one legislative hearing every three years in conjunction with the development of the State plan. [‘676(a)(3)]
- (9) To make available for the public inspection each plan or revised State plan in such a manner as will facilitate review of and comment on the plan. [‘676(e)(2)]
- (10) To conduct the following reviews of eligible entities:
  - (a) a full onsite fiscal and programmatic review of each such entity will be conducted no less than triennially;
  - (b) an onsite review of each newly designated entity immediately after the completion of the first year in which such entity receives funds through the Community Services Block Grant Program;
  - (c) follow-up reviews including prompt return visits to eligible entities, and their programs, that fail to meet the goals, standards, and requirements established by the State;
  - (d) other reviews as appropriate, including reviews of entities with programs, that have had other federal, State or local grants (other than assistance provided under the Community Services Block Grant Program) terminated for cause. [‘678B(a)]
- (11) In the event that the State determines that an eligible entity fails to comply with the terms of an agreement or the State plan, to provide services under the Community Services Block Grant Program or to meet appropriate standards, goals, and other requirements established by the State (including

performance objectives), the State will comply with the requirements outlined in Section 678C of the Act, to:

- (a) inform the entity of the deficiency to be corrected;
  - (b) require the entity to correct the deficiency;
  - (c) offer training and technical assistance as appropriate to help correct the deficiency, and submit to the Secretary a report describing the training and technical assistance offered or stating the reasons for determining that training and technical assistance are not appropriate;
  - (d) at the discretion of the State, offer the eligible entity an opportunity to develop and implement, within 60 days after being informed of the deficiency, a quality improvement plan and to either approve the proposed plan or specify reasons why the proposed plan cannot be approved;
  - (e) after providing adequate notice and an opportunity for a hearing, initiate proceedings to terminate the designation of or reduce the funding to the eligible entity unless the entity corrects the deficiency.['678C(a)]
- (12) To establish fiscal controls, procedures, audits and inspections, as required under Sections 678D(a)(1) and 678D(a)(2) of the Act.
- (13)To repay to the United States amounts found not to have been expended in accordance with the Act, or the Secretary may offset such amounts against any other amount to which the State is or may become entitled under the Community Services Block Grant program. ['678D(a)(3)]
- (14)To participate, by October 1, 2001, and ensure that all-eligible entities in the State participate in the Results-Oriented Management and Accountability (ROMA) System ['678E(a)(1)].
- (15)To prepare and submit to the Secretary an annual report on the measured performance of the State and its eligible entities, as described under '678E(a)(2) of the Act.
- (16)To comply with the prohibition against use of Community Services Block Grant funds for the purchase or improvement of land, or the purchase, construction, or permanent improvement (other than low-cost residential weatherization or other energy-related home repairs) of any building or other facility, as described in the CSBG Reauthorization Act of 1998, Section 678F(a) Construction of Facilities – (1) Limitations.
- (17) To ensure that programs assisted by Community Services Block Grant funds shall not be carried out in a manner involving the use of program funds, the

provision of services, or the employment or assignment of personnel in a manner supporting or resulting in the identification of such programs with any partisan or nonpartisan political activity or any political activity associated with a candidate, or contending faction or group, in an election for public or party office; any activity to provide voters or prospective voters with transportation to the polls or similar assistance with any such election, or any voter registration activity. [‘678F(b)]

- (18) To ensure that no person shall, on the basis of race, color, national origin or sex be excluded from participation in, be denied the benefits of, or be subjected to discrimination under, any program or activity funded in whole or in part with Community Services Block Grant program funds. Any prohibition against discrimination on the basis of age under the Age Discrimination Act of 1975 (U.S.C. 6101 et seq.) or with respect to an otherwise qualified individual with a disability as provided in Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 12131 et seq.) shall also apply to any such program or activity. [‘678F C]
- (19) To consider the religious organizations on the same basis as other non-governmental organizations to provide assistance under the program is implemented in a manner which is consistent with the Establishment Clause of the first amendment to the Constitution; not to discriminate against an organization that provides assistance under, or applies to provide assistance under the community services block grant program on the basis that the organization has a religious character; and not to require a religious organization to alter its form of internal government except as provided under Section 678B or to remove religious art, icons, scripture or other symbols in order to provide assistance under the Community Services Block Grant program. [‘679]

### **C. Other Administrative Certifications**

The State also certifies the following:

- (1) To provide assurances that cost and accounting standards of the Office of Management and Budget (OMB Circular A-110 and A-122) shall apply to a recipient of community services block grant program funds.
- (2) To comply with the requirements of Public Law 103-227, Part C Environmental Tobacco Smoke, also known as the Pro-Children Act of 1994, which requires that smoking not be permitted in any portion of any indoor facility owned or leased or contracted for by an entity and used routinely or regularly for the provision of health, day care, education, or library services to children under the age of 18 if the services are funded by a Federal grant, contract, loan or loan guarantee. The State further agrees that it will require the language of this certification be included in any sub-awards,

which contain provisions for children’s services and that all sub-grantees shall certify accordingly.

APPENDIX B.1 – Certification Regarding Lobbying

APPENDIX B.2 – Certification Regarding Drug-Free Workplace

APPENDIX B.3 – Certification Regarding Debarment, Suspension, and Other Responsibility Matters

APPENDIX B.4 – Certification Regarding Environmental Tobacco Smoke

---

Julie A. Alston, Director  
West Virginia Office of Economic Opportunity

---

Date

## **V. Narrative State Plan**

### **A. Administrative Structure**

#### **(1) State Administrative Agency: Mission and Goals**

(a) Mission Statement: The West Virginia Office of Economic Opportunity (OEO) ensures the integrity of programs by providing funding, training, technical assistance and oversight for a statewide network of partners that increase economic opportunities for individuals, families and communities in West Virginia.

In addition to the Community Service Block Grant, OEO administers Weatherization and Homeless programs. The weatherization program is funded by the US Department of Energy and by a sub-grant of Low Income Energy Assistance Program (LIEAP) funds by the West Virginia Department of Health and Human Resources. Homeless programs are funded by the US Department of Housing and Urban Development.

(b) Goals: A primary OEO goal is to support and strengthen efforts in West Virginia that allow low income residents to move to self-sufficiency. As a funder, rather than a provider of direct services, OEO has several roles in seeing that goal achieved through the direct work of CSBG eligible entities, as well as the subgrantees of other programs.

A first responsibility of a pass-through agency is to see that sub-grantees receive approved grant funds in a timely way so that necessary services are not interrupted. Hand-in-hand with that is the responsibility to monitor the use of those funds and provide oversight, training and technical assistance to subgrantees so they can effectively and efficiently meet their obligations – both in providing services and in

safeguarding the federal, state, local and private funds available to provide those services.

As the state agency administering the Community Service Block Grant, OEO also needs to be aware of other statewide public and private initiatives that also address poverty in West Virginia, and however possible, to coordinate services, and to cooperate in broad efforts to address barriers to self-sufficiency and reduce poverty in West Virginia.

**(2) CSBG Eligible Entities**

The State of West Virginia provides opportunities, services, and support through the Community Services Block Grant, to all 55 counties in the State. The State sub-grants to 16 eligible entities with geographically defined service territories that provide state wide coverage.

(a) Eligible Entities

APPENDIX B.5 – List of Eligible Entities

(b) Geographic Area Served

APPENDIX B.6 – Map of Geographic Areas Served by CSBG Eligible Entities

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

Planned Distribution of Funds for Current Fiscal Year in West Virginia will follow the CSBG criteria:

Eligible Entities:	90%
Discretionary Programs:	5%
State Administration:	5%

APPENDIX B.7 - 2012 CSBG Allocations and Distributions Chart

**B. Description of Criteria and Distribution Formula**

The Governor of West Virginia has deemed 16 community action agencies as eligible entities under the Community Services Block Grant Act, Title VI, Subtitle B, of the Omnibus Budget Reconciliation Act of 1981, Public Law 97-35, as amended. The 16 eligible entities receive 90 percent of the State’s Community Services Block Grant allotment using a Base + Formula funding method.

Each eligible entity will receive a base amount of \$150,000. An additional \$5,000 base amount is awarded for each county in the entity’s geographical service area to include all 55 counties. The remaining funds of the 90% restricted funds are divided by the number of low-income persons meeting the 125% of poverty level based on 2000 U.S. Census State Statistical data, giving an average to multiply by the number of persons meeting the criteria in each service area. The three factors will become the eligible entity’s FY 2013 allocation.

With any increases/decreases in the State's allotment, eligible entities will receive an increase/decrease in funding proportionate to the increase/decrease provided to the State.

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

CSBG Application for Funding: Ninety percent (90%) of the CSBG funds allotted to the State will be allocated to CSBG eligible entities based on the established formula. OEO negotiates the use of CSBG funds after review of the annual CSBG Application submitted by each eligible entity. The CSBG Application includes an agency resolution; annual community needs assessment certification; ROMA logic models; board of director's contractual certifications; planned budget, a community action plan describing the planned services and programs, and cost allocation plan or indirect cost rate.

Grant Period: West Virginia operates its CSBG program on a calendar year of January 1 through December 31. Eligible entities must spend the entire previous year's allotment prior to beginning a new grant. OEO will not permit an entity to spend multiple allotments simultaneously.

Extended Grant Period: To ensure all funds are expended by the program completion date, OEO works closely with agencies that are still spending carry-over funds after the 12<sup>th</sup> month of program operations. If needed, all eligible entities are given 15 months to expend one year's allotment. If after the 15<sup>th</sup> month, an entity has un-obligated funds they cannot expend, which exceed 20 percent of the amount distributed for that fiscal year, the State will help them negotiate distribution of the funds to a private, nonprofit organization, located within their service area for activities consistent with the purposes of the Community Services Block Grant program. (675C(A)(3)).

*Due to provisions in the federal appropriations act, OEO does not recapture and redistribute CSBG funds allocated to any CSBG eligible entity when the annual unobligated grant amount exceeds 20 percent of their annual grant award. Unless such provisions change in 2012, OEO will not recapture nor redistribute funds to an eligible entity.*

Distribution of Funds: Sub-grantees which maintain: (1) written procedures that minimize the time elapsing between the transfer of funds and disbursement by the recipient, and (2) financial management systems that meet the standards for fund control and accountability, have the option to be paid in advance. Recipients are authorized to submit requests for advances or reimbursements no more than monthly. The funding request and monthly expenditure report is checked against the approved budget and a report of monthly expenditures. If needed, an agency must request a contract extension in the 11<sup>th</sup> month of the current program year in order to carry-over funds.

#### **D. Description of Distribution and Use of Discretionary Funds**

The State of West Virginia will use five percent (5%) of 2013 FFY annual CSBG allocated funds to provide funding to eligible entities and other non-profit applicants representing a state-wide initiative. An applicant's submission of a proposal for funding to support activities described in Sec.675(c)(1)(A)(B) and/or projects which are innovative community and/or neighborhood based initiatives will be considered by OEO on a case-by-case basis. Discretionary funds can be awarded for the following purposes: (1) awards to local agencies for expansion to new areas, (2) grants for exemplary or demonstration programs, (3) competitive grants for exemplary or demonstration programs, (4) training and technical assistance, (5) statewide programs, and (6) general support. Eligible entities which have carried over FY 2012 funds beyond the 15<sup>th</sup> month will not be eligible to apply for discretionary funds.

#### **E. Description of Use of Administrative Funds**

The State of West Virginia will use five percent (5%) of the total grant for administrative expenses. These funds will be used for salaries, fringe benefits, rent, office supplies and other such expenses of OEO and to support monitoring, both programmatic and fiscal, of recipients of Community Service Block Grant funds, as well as providing technical assistance when feasible, required or as a result of a documented need. Administrative funds also support attendance for OEO staff to attend at least one national training provided by NASCSP annually, and at least one other skill based training.

The State of West Virginia is under the umbrella and in compliance with the Single Audit Act, in accordance with OMB Circular A-133. A copy of the State of West Virginia, Single Audit Year Ending June 30, 2010 has been submitted as required to the Federal Audit Clearinghouse, Bureau of Census. The State received the audit on March 31, 2011 and a hard copy was received by OEO on May 19, 2011.

The State's Charity Tax Credit Program is called the Neighborhood Assistance Program, which is designed to help improve distressed neighborhoods through the creation of effective partnerships between community-based organizations and the business community. No CSBG funds are utilized for this effort.

APPENDIX B.8 – OEO Administrative Funds Expenditures-Chart

#### **F. State Community Services Program Implementation**

##### **(1) Program Overview**

##### **(a) The Service Delivery System**

Resources and direct services are provided to low-income families and individuals and to communities in all 55 counties of West Virginia through the work of the 16 eligible entities, geographically located

throughout the State.

The 16 eligible entities work independently within their service territory, and join together for statewide education and advocacy around issues affecting low-income families and individuals in their communities.

West Virginia is the only state contained entirely within the Appalachian region. Its economy is profoundly influenced by its geography of mountainous areas divided by deep river valleys. Despite improved highways in the state, geography can create divisions that are difficult to bridge. The state is rich in natural resources, but patterns of land and mineral ownership have shaped the State's economic development in ways that infrastructure, labor market, and distribution systems have seldom matched the needs of the resident population.

**(b) Linkages**

CSBG eligible entities operate within a network of local service providers to reduce duplication of effort and to coordinate resources to address various client circumstances. CSBG eligible entities have developed extensive information and referral networks and/or "one stop" service centers to meet the many needs of the clients seeking services. Through linkages established within the service area individuals and families can be connected to an array of local programs and services to meet the needs of family members.

A condition of continued receipt of CSBG funds each year is the submission of an annual Community Action Application which includes information on programs which assist low-income individuals and includes the entities follow-up mechanisms. CSBG eligible entities are encouraged to provide appropriate case management services including an assessment of the household's needs and a plan of action to meet the needs and regular follow-up to ensure that clients are making progress in meeting established goals.

Overall progress of clients attaining self-sufficiency is reviewed by OEO program staff by way of quarterly programmatic data submissions via the Quarterly CSBG IS Reports.

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

Eligible entities partner with other public and private resources to provide a complete range of services for individuals, families, and communities. In Fiscal Year 2011, the eligible entities reported leveraging a total of \$99,929,000 non-Community Service Block Grant Funds to meet identified community needs.

Each CSBG eligible entity includes a description of how the entity coordinates and mobilizes public and private resources to effect maximum leveraging for CSBG funds (*ROMA Goal 4: Partnerships among supporters and providers of service to low-income people are achieved, and ROMA Goal 5: Agencies increase their capacity to achieve results*). CSBG funds provide the underpinning which enable CSBG eligible entities to operate an array of anti-poverty and social service programs. Coordination of public and private funding takes place at the local level in a variety of ways suited to the individual community and available resources. CSBG eligible entity staff and/or administrators meet with other providers in the service area to determine how best to not duplicate services while providing the services needed to meet the emergency needs of low-income persons and establishing/improving programs which assist low-income persons to transition out of poverty.

**(d) Innovative Community and Neighborhood-based Initiatives**

At least every three (3) years, each CSBG eligible entity is required to conduct an assessment of the needs of the persons in their CSBG service area. As a result of this assessment, the entity develops a plan as to how best to identify, coordinate, and/or develop local resources to address the needs identified in the community assessment. Additionally, in their annual CSBG Application they must describe the community improvement and revitalization projects to be operated and efforts to improve the quality of life and assets in low-income neighborhoods (*ROMA Goal 2: Community—The conditions in which low-income people live are improved.*). The description of these projects and efforts is to include discussion of partners and collaborators and methods that will be used to evaluate progress in achieving their goals. CSBG funds are utilized to plan such projects and efforts and to support the operation of the project and provision of services.

**(e) Community Action Network Collaboration**

The West Virginia Community Action Partnership (WVCAP) represents the 16 community action agencies and provides a forum for discussing current issues, sharing best practices and collaborating on solutions to shared problems. At the invitation of WVCAP, management of OEO attends WVCAP monthly meetings to facilitate communication with the network. Other OEO staff will attend WVCAP meetings, as needed, at the request of partnership members. OEO also supports and participates in the Annual training conference conducted by WVCAP.

**(2) Community Needs Assessments**

The Office of Economic Opportunity is working closely with the West Virginia Community Action Partnership (WVCAP) on a state-wide

community needs assessment. WVCAP represents all the eligible entities in West Virginia. The structure of the needs assessment will provide for a core set of questions to be addressed throughout the state, while allowing each eligible entity to add additional questions the entity believes is important in the communities they serve. This also provides the flexibility to coordinate the CSBG community needs assessment with similar assessments required by other funding sources. Needs assessments for other programs may not be substituted for the required tri-annual CSBG community needs assessment.

**(3) Tripartite Boards**

The State of West Virginia Office of Economic Opportunity mandates all 16 eligible entities that are private, non-profit entities to submit a membership listing of their board of directors prior to being approved to administer the Community Services Block Grant program.

Eligible entities must comply with Section 675B of the Act, in particular, they must have a tripartite board with members that are chosen in accordance with democratic selection procedures to assure that not fewer than 1/3 of its members are representatives of low-income individuals and families and reside in the neighborhood served; and are able to participate actively in the planning, implementation, and evaluation of the program to serve low-income communities. The remainder of the members are public officials or members of business, industry, labor, religious, law enforcement, education, or other major groups and interests in the community served.

**(4) State Charity Tax Credit Program**

The state charity tax credit program in West Virginia is administered by the West Virginia Development Office as the Neighborhood Investment Program. Tax credits are awarded to businesses which contribute to non-profit agencies to provide services to low-income persons. No CSBG funds are used to offset any revenue losses incurred by the state, or for any other aspects of the program. Information provided by the West Virginia Development Office indicates that community action agencies are currently using this program and have been in some form since 1997. Community Action Agencies are encouraged to obtain current information from the West Virginia Development Office and to participate as appropriate.

**(5) Programmatic Assurances**

(a) **Assurance '676(b)(1):** Funds made available through this grant are used:

- (1) **to support activities that are designed to assist low-income families and individuals** remove obstacles to self-sufficiency, secure and retain employment, attain adequate education, make better

use of available income, obtain adequate house, obtain emergency assistance and achieve greater participation in community affairs;

**(2) to address the needs of youth; and**

**(3) make more effective use of state welfare reform efforts.**

Each eligible entity prepares an annual plan that describes how they will use their allotment of CSBG funds to address the fundamental needs in their community as identified by their community needs assessment.

**(b) Assurance 676(b)(4): Eligible entities provide services needed to counteract conditions of starvation and malnutrition:**

All CSBG eligible entities either operate a food pantry on-site, or they make referrals to a local pantry where needy families can have access to food items donated by members of the community. Some CSBG eligible entities administer other food programs sponsored by the U.S. Department of Agriculture, and senior congregate and home-delivered meals programs.

**(c) State Assurance '676(b)(5): Eligible entities will coordinate and establish linkages ....to assure effective delivery of services...and avoid duplication....**

CSBG eligible entities operate within a network of local service providers to reduce duplication of effort and to coordinate resources to address various client circumstances. Many CSBG eligible entities have developed extensive linkage, information and referral networks and/or "one stop" service centers.

Coordination and service will be enhanced this fall by implementing a project with WV 2-1-1, a state-wide information and referral system, that will be able to refer low-income callers to a variety of services in their immediate area. CSBG discretionary funds have helped develop the databases and several CSBG coordinators or other eligible entity staff are active partners in the development and support of this important state-wide resource.

**(d) Assurance '676(b)(6): The State will ensure coordination among antipoverty programs**

In Program Year 2012 application, eligible entities will address local coordination plans. In addition, OEO staff will actively work to develop and expand public and private partnerships on the state level. Coordination of services will be increasingly important as federal

resources are reduced for many programs.

12 of 16 CSBG eligible entities administer Weatherization Assistance Program For Low-Income Persons using funds provided by the U. S. Department of Energy and by LIEAP funds passed through by the West Virginia Department of Health and Human Resources. Several CSBG eligible entities have working relationships with local WorkForce West Virginia boards and administer welfare-to-work programs.

**(e) Assurance '676(b)(9): Procedures to petition board of eligible entity for adequate representation.**

West Virginia has a rich tradition of the involvement of local organizations and faith-based communities in meeting the needs of low-income residents. The State and CSBG eligible entities will continue to coordinate programs and form partnerships with other organizations serving low-income residents of the communities and members of the groups served by the State, including religious organizations, charitable groups, and community organizations.

**G. Fiscal Controls and State Program**

**(1) State Program Monitoring**

The West Virginia Office of Economic Opportunity is committed to the diligent adherence to the requirements of Section 678B(a) of the CSBG Act. To accomplish this OEO is in the process of reviewing and strengthening monitoring protocols and procedures agency-wide, in the belief that monitoring is one of the most important forms of support OEO can provide to subgrantees.

- (a) As required by the CSBG Act, OEO will provide a full onsite fiscal and programmatic review of each eligible entity no less than tri-annually. The purpose of that on-site visit is to assess the necessary compliance by the eligible entity with the programmatic and fiscal requirements of the CSBG Act. This visit will be conducted in accordance with the guidance provided in Information Memorandum Transmittal No. 97, dated October 10, 2006.

OEO will provide timely feedback to eligible entities on the results of each monitoring visit with an opportunity for the monitored entity to respond to all findings and recommendations. After an on-site monitoring visit, the OEO monitoring team will provide a written monitoring report to the entity's executive director that documents the findings, corrective actions required, and recommended actions. CSBG eligible entities and other CSBG funded organizations are required to respond to the report with an assigned time frame.

The OEO monitoring team will evaluate the adequacy of the responses and corrective action. A follow-up on-site monitoring will be scheduled as deemed necessary. A copy of the state's monitoring report is also provided to the presiding officer and/or the entity's governing board at the discretion of OEO. Organizations will be advised of the defined period in which to respond to the report.

While the basic obligation of monitoring is to assess compliance, OEO also views monitoring as a continuing opportunity to understand an agency and the communities it serves, to provide a sounding board and to engage in dialogue that can result in continuous improvement of policies and program delivery.

- (b) An onsite review of each newly designated entity immediately after the completion of the first year in which such entity receives funds through the Community Services Block Grant program;
- (c) Follow-up reviews including prompt return visits to eligible entities, and their program, that fail to meet the goals, standards, and requirements established by the State. If the on-site monitoring reveals serious deficiencies and the deficiencies are not corrected in a timely manner in accordance with requirements, OEO will conduct a follow-up on-site team monitoring review and provide training and technical assistance as deemed necessary.
- (d) Other reviews are conducted as appropriate. These might include reviews of entities with programs that have had other Federal, state, or local grants (other than assistance provided under the Community Services Block Grant program) terminated for cause. ('676B(a) When a CSBG eligible entity is experiencing problems with programs other than CSBG, OEO maintains close contact with the entity to ensure that state staff members are available to provide training and technical assistance as deemed necessary for the CSBG program operations.

The State also conducts routine in-house desk reviews which include an examination of performance and expenditure rates based on monthly reports submitted to OEO by each eligible entity and a review of quarterly outcome and performance data.

- (e) Attached is a list of all eligible entities, the date of the last audit conducted and period covered by the audit.

APPENDIX B.9 – Chart of CSBG Eligible Entities Audit Dates and Period Covered

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

The West Virginia Office of Economic Opportunity fiscally monitors the 16

eligible entity's CSBG Funding Request Forms and Expenditure Reports on a monthly basis and has an onsite review no less than tri-annually.

If an entity fails to comply with terms of an agreement, the State Plan, or meet appropriate standards, goals and other requirements established by the State, the State will adhere to the following for Corrective Action, Termination, and Reduction of Funding:

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

### **(3) Fiscal Controls, Audits and Withholding**

Monthly financial reporting, tri-annual onsite reviews, compliance with the standards of the Office of Management and Budget provide the foundation of a monitoring plan used by OEO to ensure compliance with the Section 678D(a)(1) and 678D(a)(2) of the Act. OEO is committed to implementing the assurances related to fiscal control listed below:

- (a) **Assurance '676(b)(7):** The State of West Virginia, Office of Economic Opportunity, will permit and cooperate with federal investigations undertaken in accordance with Section 678D of the Act.
- (b) **Assurance 676(b)(8):** The West Virginia Office of Economic Opportunity attests that any eligible entity in the State that received funding in the previous fiscal year through a Community Services Block Grant under the Community Services Block Grant program will not have its funding terminated unless after providing notice and an opportunity for a hearing on 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) of the Act. A new funding allocation

formula may be applied for Program Year 2012 to adjust each agency's proportional share of funding using the U.S. Census Bureau data for allocation of funding per poverty level person in the service area. In the event of substantial funding decrease, with appropriate notice to both OCS and the Community Action network in West Virginia, OEO reserves the right to adjust both the base and formula distribution.

- (c) **Assurance 676(b)(10):** The West Virginia Office of Economic Opportunity requires each eligible entity in the State to establish procedures by a low-income individual, a community or religious organization, or a representative of low-income individuals that considers its organization, or low-income individuals, to be inadequately represented on the board of the eligible entity to petition for adequate representation.

## **H. Accountability and Reporting Requirements**

### **(1) Results Oriented Management and Accountability (ROMA)**

The following is a description of how the State will comply with the assurance in 676(b)(12) of the Act.

Beginning in 2001 and for several years thereafter, West Virginia CSBG eligible entities began reporting outcomes information related to the ROMA reporting requirements as required by the U. S. Department of Health and Human Services. In PY 2005, OEO subsequently began gathering performance data reported by CSBG eligible entities on the National Goals, aggregated data on a statewide basis to report outcome information for the National Association for State Community Services Programs' (NASCSPP) Information Systems (IS) Survey. In 2005, OEO began reporting performance-based data on the National Goals/National Performance Indicators (NPI) outlined below. The NPI reporting system will be used in 2013 to report outcome information and to assist in completing portions of the National IS Survey and the State's CSBG Annual Report.

Effective within the 2005 program year, OEO began requiring CSBG eligible entities, as part of their annual CSBG Application, to establish 12-month performance targets for the number of persons that they plan to serve, transition out of poverty and or achieve outcomes associated with each program service. OEO plans to monitor each eligible entity's progress toward meeting their annual target for transitioning persons out of poverty.

### **ROMA Goals and National Performance Indicators**

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

##### ***National Performance Indicator***

### **1.1 – Employment**

The number of low-income participants in community action employment initiatives who get a job or become self-employed as measured by one or more of the following:

- A. Unemployed and obtained a job
- B. Employed and maintained a job for at least 90 days
- C. Employed and obtained an increase in employment income/benefits
- D. Achieved “living wage” employment and/or benefits

### **National Performance Indicator**

#### **1.2 – Employment Supports**

The number of low-income participants for whom barriers to initial or continuous employment are reduced or eliminated through assistance from community action as measured by one or more of the following:

- A. Obtained skills/competencies required for employment
- B. Completed ABE/GED and received certificate or diploma
- C. Completed post-secondary education program and obtained certificate or diploma
- D. Enrolled children in “before” or “after” school programs
- E. Obtained care for child or other dependent
- F. Obtained access to reliable transportation and/or driver’s license
- G. Obtained health care services for themselves or a family member
- H. Obtained safe and affordable housing
- I. Obtained food assistance
- J. Obtained non-emergency LIEAP energy assistance
- K. Obtained non-emergency WX energy assistance
- L. Obtained other non-emergency energy assistance (State/ local/ private energy program. Not including LIEAP and WX)

### **National Performance Indicator**

#### **1.3 – Economic Asset Enhancement and Utilization**

The number and percentage of low-income households that achieve an increase in financial assets and/or financial skills as a result of community action assistance, and the aggregated amount of those assets and resources for all participants achieving the outcome, as measured by one or more of the following:

- A. Enhancement –
  - 1. Number and percent of participants in tax preparation programs who identify any type of Federal or State tax credit and the aggregated dollar amount of credits

2. Number and percentage obtained court-ordered child support payments and the expected annual aggregated dollar amount of payments.
  3. Number and percentage enrolled in telephone lifeline and/or energy discounts with the assistance of the agency and the expected aggregated dollar amount of savings.
- B. Utilization –
1. Number of participants demonstrating ability to complete and maintain a budget for over 90 days
  2. Number of participants opening an Individual Development Account (IDA) or other savings account
  3. Number of participants who increased their savings through IDA or other savings accounts and the aggregated dollar amount of savings
  4. Of participants in a community action assets development program (IDA and others):
    - (i) Number of participants capitalizing a small business with accumulated savings
    - (ii) Number of participants pursuing a post-secondary education due to savings
    - (iii) Number of participants purchasing a home due to accumulated savings
    - (iv) Number of participants purchasing other assets with accumulated savings

Goal 2: The Conditions in Which Low-Income People Lives are Improved

These indicators measure and collect outcomes on successful CAA projects that build “community assets,” including not only material improvements, like affordable homes and safe streets, but even changes in public policy that will reduce the causes of poverty and revitalize the low-income community.

***National Performance Indicator***

***2.1 - Community Improvement and Revitalization***

Increase in, or preservation of opportunities and community resources or services for low-income people in the community as a result of community action projects/ initiatives or advocacy with other public and private agencies, as measured by one or more of the following:

- A. Jobs created, or saved from reduction or elimination in the community
- B. Accessible “living wage” jobs created, or saved from reduction in the community.
- C. Safe and affordable housing units created in the community.

- D. Safe and affordable housing units in the community preserved or improved through construction, weatherization or rehabilitation achieved by community action activity or advocacy
- E. Accessible and affordable health care services/facilities for low-income people created or maintained.
- F. Accessible safe and affordable childcare or child development placements opportunities for low-income families created or maintained.
- G. Accessible “before” school and “after” school program placement opportunities for low-income families created or maintained.
- H. Accessible new, preserved, or expanded transportation resources available to low-income people, including public or private transportation.
- I. Accessible preserved or increased educational and training placement opportunities for low-income people in the community, including vocational, literacy, and life skill training, ABE/GED, and post-secondary education.

***National Performance Indicator***

***2.2 - Community Quality of Life and Assets***

The quality of life and assets in low-income neighborhoods are improved by community action initiative or advocacy, as measured by one or more of the following:

- A. Increases in community assets as a result of a change in law, regulation or policy, which results in improvements in quality of life and assets;
- B. Increase in the availability or preservation of community facilities;
- C. Increase in the availability or preservation of community services to improve public health and safety;
- D. Increase in the availability or preservation of commercial services within low-income neighborhoods; and
- E. Increase in or preservation of neighborhood quality-of-life resources.

***National Performance Indicator***

***2.3 – Community Engagement***

The number of community members working with Community Action to improve conditions in the community.

- A. Number of community members mobilized by Community Action that participate in community revitalization and anti-poverty initiatives
- B. Total number of volunteer hours donated to the agency

***National Performance Indicator***

## **2.4 – Employment Growth from ARRA Funds**

Employment Growth from the American Recovery and Reinvestment Act Funds

- A. Jobs created at least in part by ARRA funds
- B. Jobs saved at least in part by ARRA funds

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

### ***National Performance Indicator***

#### ***3.1 – Community Enhancement through Maximum Feasible Participation***

Total number of volunteer hours donated by low-income individuals to Community Action

### ***National Performance Indicator***

#### ***3.2 – Community Empowerment through Maximum Feasible Participation***

The number of low-income mobilized as a direct result of community action initiative to engage in activities that support and promote their own well-being and that of their community as measured by one or more of the following:

- A. Number of low-income individuals participating in formal community organizations, government, boards or councils that provide input to decision-making and policy setting through community action efforts.
- B. Number of low-income individuals acquiring businesses in their community as a result of community action assistance.
- C. Number of low-income individuals purchasing their own homes in their community as a result of community action assistance.
- D. Number of low-income individuals engaged in non-governance community activities or groups created or supported by community action.

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

### ***National Performance Indicator***

#### ***4.1 – Expanding Opportunities through Community-Wide Partnerships***

The number of organizations, both public and private, community action actively works with to expand resources and opportunities in order to achieve family and community outcomes.

Goal 5: Agencies Increase Their Capacity to Achieve Results

***National Performance Indicator***

***5.1 – Broadening the Resource Base***

The number of human capital resources available to Community Action that increase agency capacity to achieve family/community outcomes as measured by one or more of the following:

- A. Number of C-CAPs
- B. Number of ROMA Trainers
- C. Number of Family Development Trainers and Child Development Trainers
- D. Number and Hours of staff attending trainings
- E. Number and Hours of board members attending training

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

***National Performance Indicator***

***6.1 – Independent Living***

The number of vulnerable individuals receiving services from community action that maintain an independent living situation as a result of those services:

- A. Senior Citizens
- B. Individuals with Disabilities (Ages: 0-17; 18-54; 55+)

***National Performance Indicator***

***6.2 – Emergency Assistance***

The number of Low-Income individuals served by community action that sought emergency assistance and the percentage of those households for which assistance was provided, including such services as:

- A. Emergency Food
- B. Emergency fuel or utility payments funded by LIEAP or other public and private funding sources
- C. Emergency Rent or Mortgage Assistance
- D. Emergency Car or Home Repair (i.e. structural, appliance, heating system, etc.)
- E. Emergency Temporary Shelter
- F. Emergency Medical Care
- G. Emergency Protection from Violence

- H. Emergency Legal Assistance
- I. Emergency Transportation
- J. Emergency Disaster Relief
- K. Emergency Clothing

***National Performance Indicator***

***6.3 – Child and Family Development***

The number and percentage of all infants, children, youth, parents, and other adults participating in developmental or enrichment programs that achieve program goals, as measured by one or more of the following:

- A. Infants and Children –
  - 1. Infants and children obtain age appropriate immunizations, medical and dental care.
  - 2. Infant and child health and physical development are improved as a result of adequate nutrition.
  - 3. Children participate in pre-school activities to develop school readiness skills.
  - 4. Children who participate in pre-school activities are developmentally ready to enter Kindergarten or 1<sup>st</sup> Grade.
- B. Youth –
  - 1. Youth improve physical health and development.
  - 2. Youth improve social/emotional development.
  - 3. Youth avoid risk-taking behavior for a defined period of time.
  - 4. Youth have reduced involvement with criminal justice system.
  - 5. Youth increase academic, athletic or social skills for school success by participating in before or after school programs.
- C. Parents and Other Adults –
  - 1. Parents and other adults learn and exhibit improved parenting skills.
  - 2. Parents and other adults learn and exhibit improved family functioning skills.

***National Performance Indicator***

***6.4 – Family Supports***

Low-Income individuals who are unable to work, especially seniors, adults with disabilities, and caregivers, for whom barriers to family stability are reduced or eliminated, as measured by one or more of the following:

- A. Enrolled children in before or after school programs
- B. Obtained care for child or other dependent
- C. Obtained access to reliable transportation and/or driver's license
- D. Obtained health care services for themselves or family member
- E. Obtained safe and affordable housing
- F. Obtained food assistance

- G. Obtained non-emergency LIEAP energy assistance
- H. Obtained non-emergency WX energy assistance
- I. Obtained other non-emergency energy assistance  
(State/local/private energy programs)

***National Performance Indicator***

***6.5 – Service Counts***

The number of services provided to Low-Income individuals, as measures by one or more of the following:

- A. Food Boxes
- B. Pounds of Food
- C. Units of Clothing
- D. Rides Provided
- E. Information and Referral Calls

**Note: The WV Community Action Network has developed and reports on additional indicators that are specific to WV programs.**

**(2) Annual Report**

Section 678E (a)(2) of the Act requires each state to prepare and submit to the Secretary an annual report on the measured CSBG performance of OEO and its CSBG eligible entities .

The State of West Virginia submitted the 2011 CSBG Annual Information System (IS) Report, in March 2012 based on Section 678E (a) (2) and guidance from US DHHS Information Memorandum No. 95.

The State of West Virginia will comply with the requirement to submit the 2012 CSBG Annual Report outlining the network’s activities and performance by March 31, 2013. OEO has submitted Annual Reports for West Virginia’s CSBG PY 2011, through NASCSP, in accordance with CSBG Act provisions, supplemental US DHHS instructions and the NASCSP Guide to Organizing and Reporting Community Action Performance and the established OEO General Reporting Principles.

Agencies are required to report annually on their full range of ROMA outcomes, using the designated West Virginia indicators in addition to reporting on the 15 national indicators. Outcomes are to be counted and reported from all relevant community action programs and activities.

## **VI. Appendices – West Virginia**

<b>Appendix A.1</b>	Public Hearing Minutes, August 23, 2011
<b>Appendix A.2</b>	List of Public Meeting Attendees
<b>Appendix A.3</b>	Legislative Hearing Minutes, January 11, 2012
<b>Appendix A.4</b>	Notification of State Plan Availability for Comment
<b>Appendix A.5</b>	List of Newspapers and dates of publication
<b>Appendix B.1</b>	Certification Regarding Lobbying
<b>Appendix B.2</b>	Certification Regarding Drug-Free Workplace
<b>Appendix B.3</b>	Certification Regarding Debarment, Suspension, and Other Responsibility Matters
<b>Appendix B.4</b>	Certification Regarding Environmental Tobacco Smoke
<b>Appendix B.5</b>	CSBG Eligible Entities – Chart
<b>Appendix B.6</b>	Map of Geographic Areas Served by CSBG Eligible Entities
<b>Appendix B.7</b>	2012 CSBG Allocations and Distributions-Chart
<b>Appendix B.8</b>	2012 OEO Administrative Funds Expenditures-Chart
<b>Appendix B.9</b>	CSBG Eligible Entity Audit Dates and Covered Period-Chart