

Performance Review

The Governor's Office of Economic Opportunity

**The Governor's Office of Economic Opportunity
Needs to Adhere to Its State Plan and Improve What
Some Community Action Agencies Perceive as
Poor Interaction With Them**

**The Office of Community Services Finds that the
OEO Is Not in Compliance With the CSBG Act in
Funding an Interim Agency**



**July 2007
PE 07-05-410**

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John Sylvia
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July 29, 2007

The Honorable Edwin J. Bowman
State Senate
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The Honorable Jim Morgan
House of Delegates
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Dear Chairs:

Pursuant to the West Virginia Code §4-2-5, we are transmitting a Performance Review of the Governor's Office of Economic Opportunity, which will be presented to the Joint Committee on Government Operations and Joint Committee on Government Organization on Sunday, July 29, 2007. The issues covered herein are *"The Governor's Office of Economic Opportunity Needs to Adhere to Its State Plan and Improve What Some Community Action Agencies Perceive as Poor Interaction With Them;"* and *"The Office of Community Services Finds that the OEO Is Not in Compliance With the CSBG Act in Funding an Interim Agency."*

We transmitted a draft copy of the report to the Governor's Office of Economic Opportunity on July 2, 2007. A copy of Issue 2 was re-transmitted to the agency on July 26, 2007, after being modified. We held an exit conference with the Governor's Office of Economic Opportunity on July 24, 2007. We received the agency response on July 28, 2007.

Let me know if you have any questions.

Sincerely,

Handwritten signature of John Sylvia in cursive script.
John Sylvia

JS/tlc

Joint Committee on Government and Finance

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Executive Summary

Issue 1: The Governor’s Office of Economic Opportunity Needs to Adhere to Its State Plan and Improve What Some Community Action Agencies Perceive as Poor Interaction With Them.

The Governor’s Office of Economic Opportunity (OEO) is responsible for the disbursement of federal Community Service Block Grant funds to Community Action Agencies (CAAs) throughout West Virginia. The OEO is required by the federal Office of Community Service to submit and adhere to a state plan. The State Plan includes information concerning the OEO’s plans to: distribute funds; provide assurances pursuant to its federal mandate; and to support the CAAs.

Eleven of the 15 surveys were returned to the Legislative Auditor for a 73 percent response rate.

In order to assist in determining whether the OEO adheres to its state plan, the Legislative Auditor surveyed the 15 CAAs currently providing services in West Virginia. Eleven of the 15 surveys were returned to the Legislative Auditor for a 73 percent response rate. According to the results of the survey, the Office of Economic Opportunity is not adhering to its State Plan. The Legislative Auditor has identified the following deficiencies:

- While the majority of the CAAs responding stated that they have received a full onsite review in the past 3 years, 2 of the 11 stated that they have not.
- Five of the nine agencies that have had deficiencies did not receive technical assistance from the OEO. It must be noted that some agencies have requested training and technical assistance and have been denied assistance by the OEO. In addition, the CSBG Act indicates that the OEO should use CSBG funds to provide training and technical assistance to those entities in need of such training and assistance. The State Plan indicates that the OEO will conduct follow-up reviews including prompt visits to eligible entities that fail to meet goals, standards or requirements. Survey results indicate that the OEO has not consistently done this.
- Six of the 11 agencies at least disagree - 5 of which “strongly disagree” - that the OEO encourages statewide coordination and communication among the 16 eligible entities. Another example is that the State Plan indicates that the OEO will attend and participate in Community Action Partnership meetings. The OEO has not regularly attended or participated in CAP meetings.

The OEO has not regularly attended or participated in CAP meetings.

-
- Finally, 4 of the 11 respondents rated the OEO “poorly” in describing how it interacts with their CAAs.

Issue 2: The Office of Community Services Finds that the OEO Is Not in Compliance With the CSBG Act in Funding an Interim Agency.

Multi-CAP, Inc. formerly provided a wide range of services and programs such as: Head Start, Medicaid Waiver, and Meals on Wheels to the counties of Boone, Clay, Fayette, Kanawha and Putnam. As of December 31, 2006 Multi-CAP discontinued operations and relinquished its Community Service Block Grant funds to the Office of Economic Opportunity (OEO). Upon notification of closure, the OEO had to find a replacement agency in order to continue services to the communities involved. The OEO held public meetings to address the closure and to encourage public input from the communities as well as the other 15 CAAs. The OEO stated that an interim agency would be selected until an eligible or permanent entity could be designated by the Governor. The OEO entered into contracts with the Upper Kanawha Valley Enterprise Community (UKVEC). The CSBG Act requires that entities receiving CSBG funds meet certain requirements and there was some concern among the Community Action Agencies over the validity of the new entity receiving CSBG funds. The Legislative Auditor contacted the Office of Community Services (OCS) in order to address some of these concerns. **The OCS indicated that the UKVEC board composition does not meet the CSBG tripartite board requirement.** The OEO violated the CSBG Act by providing funding to an agency that does not meet the requirements of the CSBG Act. The UKVEC has agreed to add additional board members to ensure adequate representation of the communities served.

As of December 31, 2006 Multi-CAP discontinued operations and relinquished its Community Service Block Grant funds to the Office of Economic Opportunity (OEO).

Recommendations

1. *The Legislative Auditor recommends that the Office of Economic Opportunity adhere to its State Plan and complete a full onsite fiscal and programmatic review of each eligible entity annually or modify and adhere to the Plan by conducting a review at least once every three years as required by federal mandate.*
2. *The Legislative Auditor recommends that the Office of Economic adheres to its State Plan and attend the monthly Community Action*

Partnership Association meetings in order to encourage communication among eligible entities.

3. *The Legislative Auditor recommends that the Office of Economic Opportunity provide requested technical assistance to the community action agencies.*
4. *The Legislative Auditor recommends that the Office of Economic Opportunity seek ways to improve its interaction with all CAAs.*
5. *The Legislative Auditor recommends that the OEO continue to work with the Upper Kanawha Valley Enterprise Community to make sure the requirements of the tripartite board are adhered to.*
6. *The Legislative Auditor recommends that the Governor designate an eligible entity as required by 42 U.S.C 9909 of the CSBG Act.*

Review Objective, Scope and Methodology

This Performance Audit of the Governor's Office of Economic Opportunity is authorized by §4-2-5, as amended.

Objective

The report has two objectives. The first objective of the report is to assess the service provided to Community Action Agencies by the Governor's Office of Economic Opportunity through a survey of the Community Action Agencies. The final objective of the report is to review the recent closure and replacement of one of the Community Action Agencies, Multi-CAP, Inc.

Scope

The scope of this report considers activities that occurred from the previous five years.

Methodology

Information used in this report was compiled from the Governor's Office of Economic Opportunity, the Governor's Office of Economic Opportunity State Plan and Community Service Block Grant Act and a survey of the Community Action Agencies. Every aspect of this review complied with Generally Accepted Government Auditing Standards (GAGAS).

Issue 1

The Governor’s Office of Economic Opportunity Needs to Adhere to Its State Plan and Improve What Some Community Action Agencies Perceive as Poor Interaction With Them.

Results of the survey indicate that the OEO is not consistently adhering to its own State Plan.

Issue Summary

The Governor’s Office of Economic Opportunity (OEO) is responsible for the disbursement of federal Community Service Block Grant funds to Community Action Agencies (CAAs) throughout West Virginia. The OEO is required by the federal Office of Community Service to submit and adhere to a state plan. The State Plan includes information concerning the OEO’s plans to: distribute funds; provide assurances pursuant to its federal mandate; and to support the CAAs.

In order to assist in determining whether the OEO adheres to its state plan, the Legislative Auditor surveyed the 15 CAAs currently providing services in West Virginia. Eleven of the 15 surveys were returned to the Legislative Auditor for a 73 percent response rate. Results of the survey indicate that the OEO is not consistently adhering to its own State Plan. Some of the CAAs did not receive annual reviews, training/technical assistance, and others conveyed that the OEO poorly interacts with their offices. The Legislative Auditor recommends that the OEO follow the guidelines as outlined in its State Plan and federal CSBG mandates and seek ways to improve the overall interaction with CAAs.

The Community Service Block Grant serves the entire state of West Virginia through the network of Community Action Agencies

Background

The Governor’s Office of Economic Opportunity’s mission is to alleviate poverty in West Virginia by addressing and supporting non-profit community-based programs that lift families and individuals to a higher level of self-sufficiency. The OEO has three main programs. They include: administering the Community Service Block Grant (CSBG); Emergency Shelter Grants Program; and the Weatherization Technical Assistance Program.

The Community Service Block Grant serves the entire state of West Virginia through the network of Community Action Agencies for the reduction of poverty, the revitalization of low-income communities, and the empowerment of low-income families and individuals to become self-supporting. The OEO allocates \$6.3 million to 16 eligible CAAs in West Virginia. The 16 CAAs are

linked through the West Virginia Community Action Partnership (CAP). These 16 entities and the counties served are illustrated in Table 1.

| Table 1 | |
|--|---|
| Community Action Agencies of West Virginia | |
| Community Action Agency | Counties Served |
| Central WV CAA, Inc. | Harrison and Lewis |
| Change, Inc. | Brooke, Hancock, Marshall, and Ohio |
| Community Action of South Eastern WV | Mercer, Monroe, and Summers |
| Community Resources, Inc. | Calhoun, Doddridge, Gilmer, Jackson, Pleasants, Ritchie, Roane, Tyler, Wetzel, Wirt, and Wood |
| Council of the Southern Mountains | McDowell |
| Eastern WV CAA, Inc. | Grant, Hampshire, Hardy, Mineral, Morgan, and Pendelton |
| Mingo CAP, Inc. | Mingo |
| Mountain CAP, Inc. | Braxton, Upshur, Webster |
| Mountain Heart Community Services, Inc. | Wyoming |
| Multi-CAP, Inc. | Boone, Clay, Fayette, Kanawha, and Putnam |
| Nicholas County CAA, Inc. | Nicholas |
| North Central WV CAA, Inc. | Barbour, Greenbrier, Marion, Monongalia, Pochahontas, Preston, Randolph, Taylor and Tucker |
| P.R.I.D.E. in Logan County, Inc. | Logan |
| Raleigh County CAA | Raleigh |
| Southwestern CAC, Inc. | Cabell, Lincoln, Mason and Wayne |
| Telamon Corporation | Berkeley and Jefferson |
| <i>Source: West Virginia Governor's Office of Economic Opportunity</i> | |

The Governor's Office of Economic Opportunity is required to submit a State Plan to the federal Office of Community Services (OCS). The Community Service Block Grant State Plan outlines the planned distribution of the funds in FY 2006 and FY 2007. The 16 CAAs receive 90 percent of the funds, and the remaining amount is divided equally into two categories: Discretionary Funds, and State Administration Funds.

The Community Service Block Grant State Plan outlines the planned distribution of the funds in FY 2006 and FY 2007.

State Administration Funds are used for the salaries, fringe benefits, rent, office supplies, and other expenses for the daily operation of the OEO. The Discretionary Funds are made available to non-profit organizations, the Community Action Partnership, and CAAs. Preference is given to eligible entities where demonstrable need exists and where collaboration with other public and private resources is documented. Discretionary Grants may be used to provide training and technical assistance and to support innovative community and neighborhood based projects. The CSBG Discretionary application process is open throughout the grant period as long as there is adequate funding. Funding is capped at \$15,000 per proposal with exceptions made for areas of demonstrable crisis.

Discretionary Grants may be used to provide training and technical assistance and to support innovative community and neighborhood based projects.

The State Plan includes information concerning the OEO's plans to distribute funds, provide assurances pursuant to its federal mandate, and support the CAAs. The State Plan indicates that the OEO will do the following:

- support statewide communication among the Community Action Agencies;
- attend and participate in monthly Community Action Partnership meetings;
- conduct a full onsite fiscal and programmatic review of each eligible entity annually;
- conduct 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; and
- offer training and technical assistance to help correct any deficiency.

The State Plan also stipulates guidelines for corrective action, termination and reduction of funding for the CAAs.

Community Action Agencies Indicate That the OEO Is Not Consistent in Adhering to the CSBG Act or its Own State Plan

In order to determine whether the OEO adheres to its State Plan, the Legislative Auditor surveyed the fifteen Community Action Agencies currently providing services in West Virginia. One of the 16 CAAs, Multi-CAP, Inc., discontinued operation during the course of this audit and was not sent a survey. Eleven of the 15 surveys were returned to the Legislative Auditor for a 73 percent response rate. The remaining four CAAs were contacted multiple times, but did not respond. The full survey and results beside each available answer follow.

Eleven of the 15 surveys were returned to the Legislative Auditor for a 73 percent response rate.

Results of Community Action Agency Survey

1. *Has the OEO completed a full onsite review of your agency in the past three years?*

9 *Yes*

2 *No*

2. *Has the OEO offered your agency any training or technical assistance to help correct deficiencies found?*

4 *Yes*

5 *No*

2 *No deficiencies*

3. *Do you feel as though the OEO encourages statewide coordination and communication among the 16 eligible entities on a scale of 1 (strongly disagree) to 5 (strongly agree)?*

5 *Strongly Disagree*

1 *Disagree*

0 *Neutral*

2 *Agree*

3 *Strongly Agree*

-
4. *Do you feel as though the OEO supports asset building programs for low-income individuals, innovative programs and activities conducted by your agency?*

6 *Yes*

5 *No*

5. a) *Has your agency applied for any discretionary grants in the past five years?*

10 *Yes*

1 *No*

- b) *Were these grants approved or denied?*

6 *Granted*

0 *Denied*

4 *Some granted and denied*

6. *Please describe how the OEO relates or interacts with your agency using the scale below. 1 being poor and 5 being excellent.*

4 *Poor*

1 *Unsatisfactory*

1 *Neutral*

1 *Satisfactory*

4 *Excellent*

According to the results of the survey, the Office of Economic Opportunity is not adhering to its State Plan.

While the majority of the CAAs responding stated that they have received a full onsite review in the past 3 years, 2 of the 11 stated that they have not.

According to the results of the survey, the Office of Economic Opportunity is not adhering to its State Plan. The Legislative Auditor has identified the following deficiencies:

- While the majority of the CAAs responding stated that they have received a full onsite review in the past 3 years, 2 of the 11 stated that they have not. The State Plan states:

The Governor's Office of Economic Opportunity will diligently adhere to the following requirements: (a) a full onsite fiscal and programmatic review of each such entity will be conducted annually...

In addition, the CSBG Act also requires that all agencies are reviewed at least once in a three year period. Thus, the OEO is not only violating its State Plan, but also the federal CSBG Act.

Five of the nine agencies that have had deficiencies did not receive technical assistance from the OEO.

- Five of the nine agencies that have had deficiencies did not receive technical assistance from the OEO. It must be noted that some agencies have requested training and technical assistance and have been denied assistance by the OEO. In addition, the CSBG Act indicates that the OEO should use CSBG funds to provide training and technical assistance to those entities in need of such training and assistance. The State Plan indicates that the OEO will conduct follow-up reviews including prompt visits to eligible entities that fail to meet goals, standards or requirements. Survey results indicate that the OEO has not consistently done this.

The OEO has not regularly attended or participated in CAP meetings.

- Six of the 11 agencies at least disagree - 5 of which “strongly disagree” - that the OEO encourages statewide coordination and communication among the 16 eligible entities. Another example is that the State Plan indicates that the OEO will attend and participate in Community Action Partnership meetings. The OEO has not regularly attended or participated in CAP meetings.

Some agencies appear to receive the reviews and assistance requested while others do not.

Finally, 4 of the 11 respondents rated the OEO “poorly” in describing how it interacts with their CAAs. Thus, there is some evidence with the survey results that the OEO’s effectiveness is inconsistent with some of the CAAs since four of the nine agencies rated the interaction as “excellent.” Survey results further show that the OEO is not adhering to its State Plan or federal mandate consistently. Some agencies appear to receive the reviews and assistance requested while others do not. Some of the dissatisfied agencies further commented that the OEO does not or barely communicates with their offices. Thus, this survey has identified some inconsistencies in the services provided and in its interaction with individual CAAs. The Legislative Auditor recommends that the OEO follow the guidelines as outlined in its State Plan and federal CSBG mandates and be consistent in its interaction with all CAAs. This survey definitely identifies some possible weaknesses in the OEO’s operations that should be addressed.

Conclusion

The Legislative Auditor's survey of Community Action Agencies identifies areas where the Office of Economic Opportunity has not followed its State Plan or CSBG federal mandates consistently. The OEO has not performed a full onsite review of each agency in the past 3 years although the State Plan indicates that a full onsite review will occur annually. CSBG mandates require at least an inspection every three years. The OEO has not consistently provided training and technical assistance to agencies requesting assistance. Additionally, the OEO also has not attended monthly Community Action Partnership meetings which foster communication between the CAAs network. The survey also found that the OEO may have a strained relationship with some CAAs which may ultimately effect the individuals and communities that the CAAs and ultimately the OEO are committed in serving.

The OEO has not consistently provided training and technical assistance to agencies requesting assistance.

Recommendations

1. *The Legislative Auditor recommends that the Office of Economic Opportunity adhere to its State Plan and complete a full onsite fiscal and programmatic review of each eligible entity annually or modify and adhere to the Plan by conducting a review at least once every three years as required by federal mandate.*
2. *The Legislative Auditor recommends that the Office of Economic Opportunity adheres to its State Plan and attend the monthly Community Action Partnership Association meetings in order to encourage communication among eligible entities.*
3. *The Legislative Auditor recommends that the Office of Economic Opportunity provide requested technical assistance to the community action agencies.*
4. *The Legislative Auditor recommends that the Office of Economic Opportunity seek ways to improve its interaction with all CAAs.*

The survey also found that the OEO may have a strained relationship with some CAAs.

Issue 2

The Office of Community Services Finds that the OEO Is Not in Compliance with the CSBG Act in Funding an Interim Agency.

Issue Summary

The OEO has violated the CSBG Act by providing funding to an agency that does not meet the requirements of the CSBG Act.

Eligible entities are designated by the Governor of the State.

Multi-CAP, Inc. formerly provided a wide range of services and programs such as: Head Start, Medicaid Waiver, and Meals on Wheels to the counties of Boone, Clay, Fayette, Kanawha and Putnam. As of December 31, 2006 Multi-CAP discontinued operations and relinquished its Community Service Block Grant funds to the Office of Economic Opportunity (OEO). Upon notification of closure, the OEO had to find a replacement agency in order to continue services to the communities involved. The OEO held public meetings to address the closure and to encourage public input from the communities as well as the other 15 CAAs. The OEO stated that an interim agency would be selected until an eligible or permanent entity could be designated by the Governor. The OEO entered into contracts with the Upper Kanawha Valley Enterprise Community (UKVEC). The CSBG Act requires that entities receiving CSBG funds meet certain requirements and there was some concern among the Community Action Agencies over the validity of the new entity receiving CSBG funds. The Legislative Auditor contacted the Office of Community Services (OCS) in order to address some of these concerns. **The OCS indicated that the UKVEC board composition does not meet the CSBG tripartite board requirement.** The OEO has violated the CSBG Act by providing funding to an agency that does not meet the requirements of the CSBG Act.

Background

The Governor's Office of Economic Opportunity (OEO) is responsible for the allocation of the Community Service Block Grant (CSBG). Each year the OEO receives federal funds and passes 90 percent of these funds to eligible entities as required by the CSBG Act. The Office of Community Services administers the CSBG funds to the OEO and provides oversight. The remaining 10 percent is divided between administrative funds and discretionary funds.

Eligible entities are designated by the Governor of the State. The eligible entities must have a tripartite board to ensure adequate repre-

sentation of the community served. Eligible entities are also known as Community Action Agencies (CAAs) and provide a wide range of services in their communities including: senior services, mental health services, housing, transportation, meal assistance, and utility assistance. There were 16 CAAs prior to January 1, 2007 serving all 55 counties in West Virginia.

Multi-CAP, Inc. Discontinued Operation and the OEO Selected an Interim Agency to Continue Services

Some of the 15 eligible entities expressed an interest in providing services to the area formerly served by Multi-CAP.

Multi-CAP, Inc. formerly served the counties of Boone, Clay, Fayette, Kanawha, and Putnam. Multi-CAP provided a wide range of services and programs such as: Head Start; Medicaid Waiver, Meals on Wheels; Emergency Assistance for food; shelter, eviction avoidance and utilities. In June 2001, Multi-CAP entered into Chapter 11 Bankruptcy and finally had to liquidate assets. As of December 29, 2006 Multi-CAP discontinued operation and relinquished its CSBG funds to the OEO. The area formerly served by Multi-CAP includes approximately 325,106 residents of which nearly 21% live in poverty.

The OEO was notified that Multi-CAP would be discontinuing operation. The OEO had to find a replacement agency in order to continue services in the area formerly served by Multi-CAP, and held public meetings in order to address the closure and to encourage input from the communities as well as the other 15 eligible entities. Some of the 15 eligible entities expressed an interest in providing services to the area formerly served by Multi-CAP.

The Community Service Block Grant Act provides specific guidance concerning continuing services to an unserved area.

The Community Service Block Grant Act provides specific guidance concerning continuing services to an unserved area. Federal statute, 42 U.S.C. 9909 (a)(1), indicates that if any geographic area of a state is not, or ceases to be, served by an eligible entity, the governor of the state may solicit applications to designate an eligible entity from the following:

- A) a private nonprofit organization that is geographically located in the unserved area that is capable of providing a broad range of services designated to eliminate poverty and foster self-sufficiency.

B) a private nonprofit eligible entity that is geographically located in an area contiguous to or within reasonable proximity of the unserved area and that is already providing related services in the unserved area.

The governor may designate an appropriate political subdivision to serve as an eligible entity.

Federal statute, 42 U.S.C. 9910 requires that for a private, nonprofit organization to be considered to be an eligible entity, the entity shall administer the CSBG grant program through a tripartite board. A tripartite board consists of 1/3 elected officials, 1/3 low-income individuals and families in the neighborhood served, and 1/3 are members of the local business community.

The OEO selected an interim agency to ensure that services would be continuously provided to the five unserved counties.

The CSBG Act also indicates that if there is no qualified organization in or near the unserved area, then the governor may designate an appropriate political subdivision to serve as an eligible entity for the area. . The CSBG Act stipulates that, in order to serve as an eligible entity for the area, an entity shall agree to add additional members to the board of the entity to ensure adequate representation in order to comply with the tripartite board requirement.

The OEO Selected an Interim Agency Until an Eligible Entity Can Be Designated

The OEO held a series of public meetings to get feedback from the community and to indicate the process for selecting a new eligible entity to attend to the area formerly served by Multi-CAP. OEO stated that an “interim agency” would be selected in order to continue the services to the five counties affected until the OEO could designate a new eligible entity. The OEO would select an outside consultant to look at the public meeting minutes and other proposals submitted. The outside consultant would then provide guidance to the OEO in order to assist with the designation of a new eligible entity. The OEO also indicated that the interim agency was not permitted to become the eligible entity. The OEO encouraged constituents at the public meetings to submit written proposals to the OEO by January 31, 2007. The OEO also held a meeting with the other 15 CAAs of the state and encouraged these entities to submit written proposals.

The OEO selected an interim agency to ensure that services would be continuously provided to the five unserved counties. The OEO entered into contracts with the Upper Kanawha Valley Enterprise Community (UKVEC) for a grant period of January 1, 2007-December 31, 2007. The

contracts indicate that the OEO is funding the UKVEC with CSBG funds in the amount of \$824,361.

The UKVEC does not meet the CSBG Tripartite Board Requirement

The UKVEC has a board but does not comply with the tripartite board requirement of the CSBG Act.

The UKVEC has developed the Capital Resource Agency (CRA) as a “doing business as” agency to provide interim services to the five counties formerly served by Multi-CAP. The UKVEC has been incorporated since July 1999.

The UKVEC has a board but does not comply with the tripartite board requirement of the CSBG Act. The OEO determined that they could designate an interim agency not governed by a tripartite board to attend to the area formerly served as Multi-CAP. The OEO stated:

GOEO was not required under 42 U.S.C. §9909 to designate an organization to provide services in the affected service area that qualified as an eligible entity. ...UKVEC has agreed not to be considered for designation as the permanent “eligible entity” to serve the affected service area.

The State’s interpretation of the statute regarding the Tripartite boards is incorrect.

Some of the CAAs questioned the validity of funding a new entity that does not meet the eligible entity requirements. The Legislative Auditor contacted the federal office responsible for the oversight of OEO, the Office of Community Services (OCS), to inquire about the arrangement. The OCS was onsite at the OEO during the month of April 2007, and concluded that the UKVEC board composition does not meet the tripartite board requirement as set forth in the CSBG Act and cited this as a recent finding. The OCS stated:

Finding: *CAA Board Composition of Temporary Agency Replacing Multi-CAP does not meet CSBG Tripartite Board requirement.*

“The OCS reviewers learned that there had been confusion regarding the requirements of the Tripartite Board. A CAA relinquished its CSBG program and the State designated a private non-profit agency to provide CSBG services in the designated areas. The State’s interpretation of the statute regarding the Tripartite boards is incorrect. The State

(OEO) now understands the statute and is working with the newly designated CAA to make sure the requirements of a Tripartite board are adhered to.”

The OEO has violated the CSBG Act by providing CSBG funds to an agency that does not meet the tripartite board requirement.

Although the UKVEC would not like to be the eligible entity designated by the Governor, it must still meet the requirements of the tripartite board in order to receive CSBG Funds. According to a legal opinion provided by Legislative Services, the UKVEC has to meet the requirements of an eligible entity to provide services even on an interim basis.

42 U.S.C. 9907 indicates that not less than 90 percent of the funds made available to a State shall be used by the State to make grants to eligible entities. A legal opinion provided by Legislative Services states:

To the extent that UKVEC has been operating without a tripartite board or is otherwise not meeting the “eligible entity” standards of the CSBG Act, it doesn’t appear that UKVEC is in compliance with the requirements of the act.

The UKVEC has agreed to add board members to more fully reflect the service area.

Although the OEO, through its selection of the UKVEC on an interim basis, has ensured that services for the communities are not interrupted, the OEO has violated the CSBG Act by providing CSBG funds to an agency that does not meet the tripartite board requirement. In order to assure adequate representation of the community, the Legislative Auditor recommends that the UKVEC add board members to adhere to the CSBG Act. The UKVEC has agreed to add board members to more fully reflect the service area. The UKVEC Board of Directors has added board members and is seeking additional public officials from Boone, Clay and Putnam counties to join. Furthermore, the OEO has sent the results of the public meetings and all proposals received to a consultant in order to select the permanent entity. The Governor’s Office anticipates having all the information needed in order to designate a permanent eligible entity by late Summer 2007. The Legislative Auditor recommends that the Governor designate an eligible entity as required by the CSBG Act.

Conclusion

Several CAAs expressed concern that the Upper Kanawha Valley Enterprise Community is not a valid interim agency to replace Multi-CAP, Inc. because it did not meet all the requirements of the CSBG Act. After a review of the arrangement, the Legislative Auditor found

that the Office of Economic Opportunity is not in compliance with the Community Service Block Grant Act by funding the Upper Kanawha Valley Enterprise Community because the agency does not meet the tripartite board requirement. The Governor anticipates all the information needed in order to designate a permanent eligible entity by late Summer 2007.

Recommendations

5. *The Legislative Auditor recommends that the OEO continue to work with the Upper Kanawha Valley Enterprise Community to make sure the requirements of the tripartite board are adhered to.*
6. *The Legislative Auditor recommends that the Governor designate an eligible entity as required by 42 U.S.C 9909 of the CSBG Act.*

Appendix A: Transmittal Letter

WEST VIRGINIA LEGISLATURE *Performance Evaluation and Research Division*

Building 1, Room W-314
1900 Kanawha Boulevard, East
Charleston, West Virginia 25305-0610
(304) 347-4890
(304) 347-4939 FAX



John Sylvia
Director

July 2, 2007

Mr. Edwin Harper, Executive Director
Governor's Office of Economic Opportunity
950 Kanawha Blvd., East
3rd Floor
Charleston, WV 25301

Dear Mr. Harper:

This is to transmit a draft copy of the Special Report on the Governor's Office of Economic Opportunity. This report is scheduled to be presented during the July 2007 interim meeting of the Joint Committee on Government Operations. We will contact you when the interim meeting details are attained. It is expected that a representative from your agency be present at the meeting to orally respond to the report and answer any questions the committee may have.

We need to schedule an exit conference to discuss any concerns you may have with the report. Please contact us to schedule a meeting at your earliest convenience. In addition, we need your written response by noon on July 11, 2007 in order for it to be included in the final report. If your agency intends to distribute additional material to committee members at the meeting, please contact the House Government Organization staff at 340-3192 by Tuesday, July 24, 2007 to make arrangements.

We request that your personnel not disclose the report to anyone not affiliated with your agency. Thank you for your cooperation.

Sincerely,

A handwritten signature in cursive script that reads "John Sylvia".

John Sylvia

Joint Committee on Government and Finance

Appendix B: OCS Response to Issue Two

Aaron Allred

From: Thompson, Peter (ACF) [peter.thompson@acf.hhs.gov]
Sent: Friday, July 27, 2007 3:51 PM
To: Arley Johnson; Eharper@oeo.state.wv.us; allred@mail.wvnet.edu
Cc: Robinson, Josephine B (ACF); Butler, Yolanda (ACF); Lumpkin, Wally (ACF)
Subject: CSBG

Importance: High

Gentlemen:

This email is written in response to phone conversations that I have had with you today over the State of West Virginia's designation of Upper Kanawha Valley Enterprise Community (UKVEC) as an interim agency and the audit finding contained in the audit report from the States Performance Evaluation and Research Division relative to the designation. After reviewing the fax sent to me by Mr. Allred and listening to the concerns of Mr. Johnson and Mr. Harper, I offer that the facts outlined in Mr. Allred's fax, which was indicated to me to be a copy of the audit finding, are factual. However, I expressed to Mr. Allred that the Issue Summary section of the finding, specifically the final two sentences in the last paragraph could be misconstrued if one does not read further into the finding. As indicated later in the write-up, both the federal Office of Community Services and the State are, and have been, aware of the fact that the composition of UKVEC's board is in violation of statute. However, the State has been in conversation with, and has complied with requests by the federal government to move to correct this matter. Given these facts, I have commented to Mr. Allred that he consider revising the two sentences in the Issue Summary to more fairly represent this fact.

Respectfully,

Peter Thompson

Director, Division of State Assistance
Office of Community Services
Administration for Children and Families
U.S. Dept. of Health and Human Services
370 L'Enfant Promenade, SW. Washington, DC 20447
Phone - 202-401-4608 Fax: - 202-205-4014
Email - Peter.Thompson@acf.hhs.gov

Appendix C: Agency Response



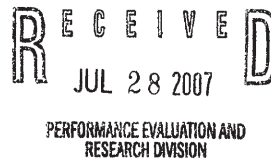
OFFICE OF ECONOMIC OPPORTUNITY

950 Kanawha Boulevard, East
Charleston, WV 25301

July 26, 2007

Telephone: (304) 558-8860
FAX: (304) 558-4210

Mr. John Sylvia
Director
West Virginia Legislature
Performance Evaluation and Research Division
Building 1, Room W-314
Charleston, WV 25301



Dear Mr. Sylvia:

I appreciate your insightfulness and thorough conversation concerning the Legislative Auditor's report on the Governor's Office of Economic Opportunity (GOEO).

As per your instructions GOEO is providing your office with our responses to the four recommendations in the Auditor's report and exit conference on July 24, 2007. We are including supporting and educational material to lend clarity to the operation of GOEO.

My staff and I will be in the House of Delegates Chamber on Sunday, July 29, 2007 to answer any questions concerning the four recommendations from the presentation to the Legislative Committee for Performance and Evaluation by Ms. Short and Mr. Rhodes.

Sincerely,

A handwritten signature in cursive script that reads "Edwin S. Harper".

Edwin S. Harper
Director

ESH:rj

cc: Joe Ward
Larry Puccio

PREAMBLE

I can only speak to the timeframe beginning March 15, 2006. I have been able in this past year to identify this office's strengths and its weaknesses. I was placed in this office to do a job of managing, planning and curing. With limited resources and dwindling Federal dollars that finance our programs, I have found that we do not have the luxury that is afforded other state OEO operations that are subsidized with millions of dollars from their state budgets. In terms of the work and funding of the Governor's Office of Economic Opportunity (GOEO), at this time, there are no State funds budgeted or spent in this venture. Coupled with this and my introduction to GOEO I was immediately informed that the current Administration desired to cut or eliminate CSBG dollars for Federal PY07 and PY08. Having said that the whole process of advancement demands imagination and aggressive initiatives to meet our "mountainous" poverty needs.

Given that GOEO has dealt with a Multi-CAP crisis situation and the corrective initiatives dictated by that crisis, demanded and necessitated a thorough and time-consuming process to fashion a remedy. At the same time the needs of 15 other agencies and the state association that was formed among them was experiencing considerable dissension. This required significant demands of GOEO time with an already limited staff.

Time restraints certainly impair a goal as lofty as a sixteen (16) agency monitoring in a twelve (12) month period. Sixteen (16) monitorings in a 12 month period is ambitious at the least. Add to that challenge that if GOEO identifies significant deficiencies in any one of the 16 agencies, GOEO could face 30 days to one year providing additional support in addition to the remaining monitoring responsibilities. Again our new state plan due out this fall will reflect a monitoring schedule compliant with Federal law.

Our greatest tool for the identification of an agency in crisis is usually derived from and recognized in the annual fiscal monitoring of the agency. Community Services Block Grant (CSBG) monies are the glue of the Community Action Agencies (CAAs). While a plethora of grant opportunities are available to the CAAs there often are no administration dollars attached to them. Because the administration of those grants are paid for out of the CSBG we are charged with oversight of the health of that agency as a whole and the overall impact of that agency communitywide. Each grant adds another layer to service and capacity building of an agency for programs from HUD, ACF, DOE and HHS as well many others.

The fiscal agency wide monitoring can identify a deficiency in a program that may be significant enough to destabilize the whole corporation by draining its corporate funds to a deficit level at best and bankruptcy at worst.

With this factual model before you please remember that Multi-CAP and at least 2 other agencies in this state have demanded great energy and time from the GOEO staff.

We have expended untold hours in answering Legislative Auditor's questions, a scheduled monitoring by the Office of Community Services and several FOIA responses. If there is any criticism for missed monitoring, CSBG is handled by a Director of Programs, CSBG Director, and Auditor and an executive office secretary. This is at times an overwhelming task in the process of the service to the state with 29.8% of its citizens living below the 150% poverty line set by the federal government.

We have accepted this challenge and appreciate under girding assistance to do the best job possible for the most vulnerable Citizens of West Virginia.

July 27, 2007

Issue 1: The Governor's Office of Economic Opportunity (GOEO) Needs to Adhere to It's State Plan and Improve What Some Community Action Agencies Perceive as Poor Interaction With Them.

Recommendation One: *The Legislative Auditor Recommends that the Office of Economic Opportunity adhere to its State Plan and complete a full onsite and programmatic review of each eligible entity annually or modify and adhere to the Plan by conducting a review at least once every three years as required by federal mandate.*

Response One: *GOEO accepts this recommendation with the understanding of the following.*

Recognizing the need to increase the efficiency and effectiveness of the GOEO Monitoring practices, this office has embarked on a complete overhaul of the practices, policies and methodologies employed to support monitoring of the 16 WV Eligible Entities know as Community Action Agencies (CAAs). These changes are a direct consideration of the 2003 Community Services Block Grant (CSBG) program assessment conducted by the Government Accounting Office (GAO) and remain consistent with our federal mandates.

See Attachment 1 - Detailed Information of the GAO Community Services Block Grant Assessment

In addition, GOEO follows the Office of Community Services Information Memorandum 94 (IM94) to recommend immediate action by State CSBG lead agencies, State Community Action Associations, and local community action officials to reinforce the importance of effective management systems, strong internal controls, and strengthen governance of Boards of Directors. Federal Head Start Reviews is the initial topic for IM94. However, parallel issues of importance are highlighted related to the overall operations of CAAs to help improve compliance with program coordination requirements and expectations described in the Community Services Block Grant Act. Additionally, longer-term opportunities and strategies are emphasized regarding:

- Strategic Planning and Program Coordination

-
- Program Administration and Financial Management
 - Tripartite Board Training and Empowerment
 - One Agency, One Mission

See Attachment 2 - OCS IM 94

In April 2006, GOEO secured the services of an organization that has become nationally recognized within the CSBG administration and agency network. The organization, Meliora Partners, has a team of peer-to-peer trainers with cumulative experience of over 70+ years in the disciplines of finance, accounting, monitoring, technical assistance and intervention on behalf of CAAs in crisis. GOEO began, that spring, to work with the Meliora team to develop a comprehensive monitoring tool that would not only gauge an agencies surface capabilities and compliance, but document and measure their overall health, strength of their systems to support viability and indicate to the network and GOEO areas in which technical assistance is warranted.

By October 2006, GOEO had initiated this monitoring methodology, under the supervision of the Meliora team, with a team of our own. Our team was comprised of top notch staff from all programs and management sectors including a fiscal auditor and accountant, the WV CSBG administrator, the WV Homeless Services administrator, A WV Weatherization monitor, a specialist in the areas of the laws governing CAAs, and an Information Systems and Results Oriented Management and Accountability Specialist. Since that time GOEO has successfully monitored 5 agencies using the comprehensive team approach with a goal of 4 additional agencies monitored by years end.

See Attachment 3 – GOEO Monitoring Tool

In 2006, GOEO modified its CSBG Contract Requirements, effective for program year 2007 to include additional and ongoing monitoring practices and performance and fiscal review procedures.

- a. Monthly – Fiscal audits occur on all CAA CSBG Funding Reimbursement Requests and Expenditure Reports
- b. Quarterly – Agencies are required to submit customer units, characteristics and demographics for customers served and outcome or performance data for all programs operated by the agency regardless of the funding sources.
- c. GOEO has implemented stringent data collection and quality assurance practices to ensure that the data being reported is verifiable, relevant and complete.
- d. Through the develop of the DBA FACS Pro™ (FACS-Family, Agency and Community System) management information

system GOEO has the ability to desk monitor, trends in service and support agencies that previous monitoring results have as yielded issues or concerns.

- e. Via DBA FACS Pro™ GOEO has access to statewide real time service, program, customer and outcome data.

GOEO's State Plan for 2007-2009 is due to be submitted this fall and it will be modified to accurately reflect the time restraints and available staff supporting the monitoring requirements, while fully meeting our legal responsibilities of a three year programmatic monitoring cycle which is consistent with our federal mandate.

Recommendation Two: *The Legislative Auditor recommends that the Office of Economic Opportunity adhere to its State Plan and attend the monthly Community Action Partnership Association meetings in order to encourage communications among eligible entities.*

Response Two: *GOEO accepts this recommendation with the following understanding.*

The West Virginia Community Action Partnership (WVCAP) is on paper a State Association of Executive Directors (ED) that represents the sixteen (16) Community Action Agencies (CAA) serving all fifty-five (55) counties of the State.

The perception is quite different from the present reality. On or about February 2006 a major split in the membership occurred. The particulars of the dispute or disputes shall be left to their ranks. The result has been that half of its dues paying members have withdrawn from the association or should it be said are in a state of disaffiliation. To date, the WVCAP has representation from 9 of the 16 CAAs in West Virginia.

My charge as the Director of GOEO is to serve all sixteen (16) CAAs. As families and nations split apart so do members of associations. My solution to the WVCAP split has been to personally visit each and every agency site and attempt to maintain a positive relationship with and between each agency. Because of the contentious split among the CAAs, GOEO has committed to communicating directly to the CAA network vs. communicating around and through WVCAP. This stance has actually increased the consistent delivery of the GOEO messages as our staff are not held to task by the WVCAP.

Your report is critical of my attendance record to the WVCAP board meetings in spite of an eighty (80) percent attendance record since my employment with GOEO that began in April 2006.

Also when I attend the WVCAP meetings it is perceived that I am taking a position in support of the WVCAP Association while excluding those that have chosen to remain nonaffiliated.

Therefore, I have determined that quiet and sustained diplomacy is the approach that should be advanced in the matter at hand. Likewise, the discretion ought to be left to the Director of GOEO to meet with those who choose to affiliate with the WVCAP Association and with those that choose to affiliate otherwise. At the end of the day, we can suggest, we can urge, but we cannot compel Executive Directors to collaborate with one another.

Recommendation Three: *The Legislative Auditor recommends that the Office of Economic Opportunity provide requested technical assistance to the CAA's.*

Response Three: *GOEO accepts this recommendation with the following understanding.*

GOEO is cognizant that where substantial deficiencies are found GOEO must offer technical assistance. Support may be in the form of staff training by GOEO personnel or support provided by consultants with technical expertise.

Moreover, there should remain the discretion with the GOEO concerning the determination of grant requests regarding their scope, necessity and cost. Not all requests are given a favorable response. However, this should not be interpreted that GOEO is being unmindful of the need for assistance. To assume that all deficiencies require training or technical assistance is incorrect. Quality improvement measures can be established and monitored and agencies can typically achieve them without intervention or assistance, but instead through a change in policy or practice.

By way of background, if a substantial or severe deficiency goes without the offer of remedial assistance, GOEO is cognizant that it can be cited by various funding sources, for example, the Office of Community Services. However, it is in the mutual interest of GOEO as well as, the CAAs to see that severe deficiencies are remedied.

See Attachment 4 – Discretionary Grant Awards PY 2005, 2006 and 2007.

The GOEO staff knows firsthand the challenges WV CAAs face in managing multiple funding streams and maintaining program compliance. We have worked in community action at the local, state, regional and national levels. It is our mission to help community action agencies across the state rebuild programs and agencies, thereby increasing their capacities to serve low-income and vulnerable populations.

Recommendation Four: *The Legislative Auditors recommend that the Office of Economic Opportunity seek ways to improve its interaction with all CAAs.*

Response Four: *GOEO agrees with the Legislative Auditors recommendation with the following understanding:*

To illustrate ongoing activities that indicate recognition of and progress in Recommendations 3 and 4, this Office and the GOEO Director and members of his staff have visited every CAA and several of the satellite offices. In addition, GOEO has hosted and offered...

- board training sessions in the field,
- working lunches to discuss agency capacity opportunities;
- meetings at the Governor's Office of Economic Opportunity to discuss programs, projects and training and technical assistance;
- GOEO encourages and directly supports input from each and every CAA in the areas of policy, tools, practices and processes development;
- GOEO and its staff can indicate an ongoing network support as documented by hundreds of phone calls and e-mails addressing the immediate needs of individual and collective CAA activities.

The strongest indicator of this point is the GOEO support for the West Virginia ROMA (Results Oriented Management and Accountability) Implementation Task Force. GOEO supports and encourages attendance and participation from all 16 CAAs and their representatives in monthly task force meetings, ongoing active committee meetings and training opportunities throughout the month.

See Attachment 5 – Results Oriented Management and Accountability

The Mission of the West Virginia ROMA Task Force is to support ROMA implementation in West Virginia Community Action Agencies through the provision of leadership, technical assistance and support. Outcomes of ROMA implementation will include:

- Renewed focus on family/client self-sufficiency, increase in agency capacity, advocacy and community development, collaboration and partnerships and the successful achievement in outcomes attributed to such.
- Comprehensive data collection and management;
- Timely, accurate and relevant reporting;
- Greater agency accountability with a focus on quality assurance;
- Increase in favorable public recognition of the contributions of West Virginia Community Action Agencies and their programs and services

Specific tasks of the Task Force to support ongoing ROMA Implementation include but are not limited to...

- a) Ongoing support, planning and implementation of the statewide data management system, DBA FACS Pro™.
- b) Ongoing assessment of West Virginia ROMA Implementation and Transition Plans, development and documentation of ROMA Best Practices.
- c) Identification and provision of technical assistance, training and support needs and resources for ROMA Implementation.
- d) Development and maintenance of the West Virginia family, agency and community system.

See Attachment 6 - WV ROMA Task Force Meeting Minutes

And finally, the GOEO website at www.wvf.state.wv.us/oeo/ provides support various areas in support of statewide communication, including notice and information memorandum, meeting schedules, and an online calendar where information for the entire network can be posted and maintained (see attachment 4). We also encourage all agencies to submit information to us so it can be placed on the website.

See Attachment 7 - Sample of GOEO Calendar

Issue 2: The Office of Community Services Finds the OEO Is Not in Compliance with the CSBG Act in Funding an Interim Agency

Recommendation Five: The Legislative Auditor recommends that the OEO continue to work with the Upper Kanawha Valley Enterprise Community to make sure the requirements of the tripartite board are adhered to.

Response Five: The GOEO accepts the recommendation by the Legislative Auditor and will seek to ensure as feasible the planned compliance with the federal law on this matter consistent with the following understanding.

By way of background, with the demise of Multi-CAP a service provider or eligible entity had to be found to fill the breach. The law, it has been written, abhors a forfeiture. OEO contacted the Office of Community Services for guidance regarding the selection of an interim agency.

In a letter from Peter Thompson, Director of Division of State Assistance, Office of Community Services, he writes "OCS has never given specific guidance on the process of selecting an Interim Agency. Therefore, our position would be that, in the process of selecting an interim agency, the State needs to follow their own laws in establishing interim and/or new agencies, as well as follow the procedures set forth in the Statute..."

Moreover, under Federal law, as found in 42.U.S.C.9909 (a) (1) indicates that if any geographic area of a state is not, or ceases to be served by an eligible entity, the Governor of the state may solicit applications to designate an eligible entity from the following:

A. A private nonprofit organization that is geographically located in the unserved area that is capable of providing a broad range of services designated to eliminate poverty or foster self-sufficiency in a word, an eligible entity could serve that was located within the five-county area of Boone, Clay, Putnam, Kanawha and Fayette.

B. A private nonprofit entity that is geographically located in an area contiguous to or within reasonable proximity of the served unserved area and that is already providing related services in the unserved.

Community Action Agencies contiguous to the five-county area are found in Raleigh, Wood, Cabell, Nicholas, Logan, Wyoming, Upshur, Marion and Mercer.

The statute has a further requirement that the selected eligible entity shall have a tripartite board consisting of one-third elected officials, one-third low income individuals and families in the neighborhood served, and one-third are members of the local business community.

Within the five-county area of Boone, Clay, Kanawha, Putnam and Fayette an eligible entity in Boone initially agreed to serve as the interim eligible agency. However, right before the termination of the CSBG grant to Multi-CAP in late December, that eligible entity declined to serve.

Faced with the prospect of a forfeiture regarding the provision of services, i.e., loss of utility assistance to low-income persons, closing of food pantries, termination of meals on wheels, all at the turn of the clock with the beginning of the New Year, Upper Kanawha Valley Enterprise Community was selected to ensure that services would be continuously provided to the five unserved counties.

This selection was made under the provisions of 7-13-2 of the West Virginia Code which provides:

The Governor is authorized to extend official recognition to duly constituted community action program organizations which comply or are in the process of complying with regulations as established by the federal office of economic opportunity. The important language here is "which comply or in the process of complying."

Moreover, the GOEO was in constant and continuing communication with the Office of Community Services regarding this selection and the OCS was apprised and made aware that all of the tripartite board conditions had not been met by this entity, but that planned compliance or that the pursuit of compliance would be undertaken.

The four corners of the tripartite statute were not met. However, in the real world where interrupting the provision of services could mean living without utilities, food pantries going unstocked and unmanned, necessity trumped privation.

Since the award of the CSBG to Upper Kanawha Valley Enterprise Community two things occurred. First, GOEO continues to be in conversation with OCS on this particular matter and we have complied with the federal government's requests to move to correct this matter. Note that GOEO does not have coercive powers to compel county or city government officers, business leaders, or low-income persons in the area to serve on voluntary unpaid Boards of Directors.

Second, with knowledge of the lack of a tripartite status from the beginning, the Office of Community Services has not attempted to block or interdict in any manner, the funding of this particular CSBG grant to UKVEC, the interim agency. The Office of Community Services will not allow mere form to overtake substance and succor when needed.

Recommendation Six: The Legislative Auditor recommends that the Governor designate an eligible entity as required by 42 USC 9909 of the CSBG Act.

Response Six: GOEO agrees with this recommendation with the following understanding.

The Community Services Block Grant was relinquished by the Multi-CAP, Inc. Board of Directors effective December 31, 2006, leaving a five county area, including the capital city, without services to those suffering the effects of poverty.

The WV Governor's Office of Economic Opportunity worked to ensure the service area formerly covered by Multi-CAP, Inc. did not go unserved. This was accomplished by developing a Memorandum of Understanding with a private, non-profit, 501-C-3 corporation to develop a division to provide interim services with Community Services Block Grant funds. The corporation chosen was Upper

Kanawha Valley Enterprise Community, Inc. which developed a division under the name of Capital Resource Agency, Inc. to serve the five county areas.

GOEO sought the advice of experts from the Office of Community Services, the National Association of State and Community Service Programs (NASCS), as well as, advice from other states having experienced similar problems, and legal advice on this matter generally.

Due to the nature of block grants, States have the responsibility of developing a plan of action to ensure services are continued to those that depend upon them. The federal and state regulations must be followed in developing a strategy to determine or select an entity to provide ongoing services.

GOEO determined that public input was the first step in gathering information for the future of services in the area formerly served by Multi-CAP, Inc. Public hearings were held for County Commissioners, Mayors and other public officials, low-income service providers, clergy, business leaders and community action agencies contiguous to the service area.

The public hearings were held from November 20, 2006 through November 27, 2006. Records of the public hearings are published on the website for GOEO.

Following publication of the public hearing transcript, GOEO researched to determine the process for the Request for Proposals to consultants to assess the service area and make a recommendation to the Governor of the State.

The RFP was sent to H & D Associates; Community Research Partners; Mid-Iowa Community Action Agency, Inc. and Brown, Buckley, and Tucker.

Upon reviewing the proposals, H & D Associates, Inc. was awarded the proposal to provide a comprehensive assessment of the service area as well as those agencies and private, non-profit organizations that bid on the five county areas formerly served by Multi-CAP.

H & D Associates, Inc. signed a contract with GOEO on May 9, 2007 and began interviews May 21-25, 2007 as well as June 11-13, 2007. H & D Associates, Inc. submitted their conclusions.

The information has been submitted to the Governor for his determination concerning the establishment of a new eligible entity.



Attachment 1

GAO – PART Assessment CSBG



DETAILED INFORMATION ON THE COMMUNITY SERVICES BLOCK GRANT ASSESSMENT

- View this [program's assessment summary](#).
- Visit [ExpectMore.gov](#) to learn more about how Federal Government programs are assessed and their plans for improvement.
- [Learn more](#) about detailed assessments.

| Program Code | 10001055 | | | | | | | | | | |
|--|---|---------------|-------|--------------------------|-------|--------------------|-----|--------------------|-----|--------------------------------|----|
| Program Title | Community Services Block Grant | | | | | | | | | | |
| Department Name | Dept of Health & Human Service | | | | | | | | | | |
| Agency/Bureau Name | Administration for Children and Families | | | | | | | | | | |
| Program Type(s) | Block/Formula Grant | | | | | | | | | | |
| Assessment Year | 2003 | | | | | | | | | | |
| Assessment Rating | Results Not Demonstrated | | | | | | | | | | |
| Assessment Section Scores | <table border="1"> <thead> <tr> <th>Section</th> <th>Score</th> </tr> </thead> <tbody> <tr> <td>Program Purpose & Design</td> <td>80%</td> </tr> <tr> <td>Strategic Planning</td> <td>12%</td> </tr> <tr> <td>Program Management</td> <td>89%</td> </tr> <tr> <td>Program Results/Accountability</td> <td>0%</td> </tr> </tbody> </table> | Section | Score | Program Purpose & Design | 80% | Strategic Planning | 12% | Program Management | 89% | Program Results/Accountability | 0% |
| Section | Score | | | | | | | | | | |
| Program Purpose & Design | 80% | | | | | | | | | | |
| Strategic Planning | 12% | | | | | | | | | | |
| Program Management | 89% | | | | | | | | | | |
| Program Results/Accountability | 0% | | | | | | | | | | |
| Program Funding Level (in millions) | <table border="1"> <tr> <td>FY2006</td> <td>\$630</td> </tr> <tr> <td>FY2007</td> <td>\$630</td> </tr> <tr> <td>FY2008</td> <td>\$0</td> </tr> </table> | FY2006 | \$630 | FY2007 | \$630 | FY2008 | \$0 | | | | |
| FY2006 | \$630 | | | | | | | | | | |
| FY2007 | \$630 | | | | | | | | | | |
| FY2008 | \$0 | | | | | | | | | | |

- [Program Improvement Plans](#)
- [Program Performance Measures](#)
- [Questions/Answers \(Detailed Assessment\)](#)

Program Improvement Plans

| Year Began | Improvement Plan | Status | Comments |
|------------|---|---------------------------------|--|
| 2006 | Restructuring program monitoring and evaluation to improve program administration, accountability, and outcomes of state and local agencies that serve the poor. Milestone: Distribute data collection tools to grantees, and receive feedback on them. | Action taken, but not completed | |
| 2006 | Working with Congress to eliminate the program due to the program's minimal performance standards and overlapping services with other Federal programs. | Action taken, but not completed | The President's Budget for FY 2007 recommends the elimination of the CSBG program. |

Program Performance Measures

| Term | Type | Measure |
|-------|---------|--|
| Long- | Outcome | Measure: Number of conditions of poverty reduced. |

| term/Annual | | <i>Explanation:</i> | | | | | | | | | | | | | | | | | | |
|-------------|-------------------|--|------|--------|--------|------|----------|------------|------|------------|------------|------|-------------------|-----------|------|-------------------|-----------|------|-------------------|-----------|
| | | <table border="1"> <thead> <tr> <th>Year</th> <th>Target</th> <th>Actual</th> </tr> </thead> <tbody> <tr> <td>2004</td> <td>Baseline</td> <td>19 million</td> </tr> <tr> <td>2005</td> <td>20 million</td> <td>27 million</td> </tr> <tr> <td>2006</td> <td>4% increase prvFY</td> <td>July 2007</td> </tr> <tr> <td>2007</td> <td>4% increase prvFY</td> <td>July 2008</td> </tr> <tr> <td>2008</td> <td>4% increase prvFY</td> <td>July 2009</td> </tr> </tbody> </table> | Year | Target | Actual | 2004 | Baseline | 19 million | 2005 | 20 million | 27 million | 2006 | 4% increase prvFY | July 2007 | 2007 | 4% increase prvFY | July 2008 | 2008 | 4% increase prvFY | July 2009 |
| Year | Target | Actual | | | | | | | | | | | | | | | | | | |
| 2004 | Baseline | 19 million | | | | | | | | | | | | | | | | | | |
| 2005 | 20 million | 27 million | | | | | | | | | | | | | | | | | | |
| 2006 | 4% increase prvFY | July 2007 | | | | | | | | | | | | | | | | | | |
| 2007 | 4% increase prvFY | July 2008 | | | | | | | | | | | | | | | | | | |
| 2008 | 4% increase prvFY | July 2009 | | | | | | | | | | | | | | | | | | |
| Annual | Efficiency | <p>Measure: Reduce total grantee and sub-grantee CSBG administrative expenditures per individual served.</p> <p><i>Explanation:</i></p> <table border="1"> <thead> <tr> <th>Year</th> <th>Target</th> <th>Actual</th> </tr> </thead> <tbody> <tr> <td>2004</td> <td>Baseline</td> <td>\$9.61</td> </tr> <tr> <td>2005</td> <td>N/A</td> <td>July 2007</td> </tr> <tr> <td>2006</td> <td>N/A</td> <td>July 2008</td> </tr> <tr> <td>2007</td> <td>\$9.51</td> <td>July 2009</td> </tr> <tr> <td>2008</td> <td>\$9.41</td> <td>July 2010</td> </tr> </tbody> </table> | Year | Target | Actual | 2004 | Baseline | \$9.61 | 2005 | N/A | July 2007 | 2006 | N/A | July 2008 | 2007 | \$9.51 | July 2009 | 2008 | \$9.41 | July 2010 |
| Year | Target | Actual | | | | | | | | | | | | | | | | | | |
| 2004 | Baseline | \$9.61 | | | | | | | | | | | | | | | | | | |
| 2005 | N/A | July 2007 | | | | | | | | | | | | | | | | | | |
| 2006 | N/A | July 2008 | | | | | | | | | | | | | | | | | | |
| 2007 | \$9.51 | July 2009 | | | | | | | | | | | | | | | | | | |
| 2008 | \$9.41 | July 2010 | | | | | | | | | | | | | | | | | | |

Questions/Answers (Detailed Assessment)

| Section 1 - Program Purpose & Design | | | |
|--------------------------------------|--|--------|-------|
| Number | Question | Answer | Score |
| 1.1 | <p>Is the program purpose clear?</p> <p><i>Explanation:</i> The program's purpose is to reduce poverty, revitalize low-income communities and empower low-income families and individuals to be self-sufficient. To accomplish this purpose, CSBG provides flexible core or foundational funding to over 1000 community-based organizations (Community Action Agencies, or CAAs) in almost every county in the nation to promote innovative, community-generated and location-specific actions to reduce the incidence and severity of poverty.</p> <p><i>Evidence:</i> Community Opportunities, Accountability, and Training and Educational Services Act of 1998 (Coats Human Services Reauthorization Act of 1998)--title II, Subtitle B--Community Services Block Grant Program (42 U.S.C. 9901 et seq); Community Services Block Grant Program Fact Sheet; and History, Purpose and Perspective Information Sheet.</p> | YES | 20% |
| 1.2 | <p>Does the program address a specific and existing problem, interest, or need?</p> <p><i>Explanation:</i> Poverty in America remains a persistent and complex problem, often rooted in market or societal conditions, especially unemployment, inadequate housing, and a lack of educational opportunity.</p> <p><i>Evidence:</i> U.S. Census Bureau, OMB Poverty Thresholds for 2002, CSBG Act (42 U.S.C. 9902--Poverty Line) and CSBG Act (42 U.S.C. 9910--tripartite Boards).</p> | YES | 20% |

| | | | |
|---|--|-----|-----------|
| 1.3 | Is the program designed so that it is not redundant or duplicative of any Federal, state, local or private effort? | YES | 20% |
| <p><i>Explanation:</i> The program is designed to empower communities to address local needs via the tripartite Board governance structure of CAAs. Consisting of three groups--public officials, members of the low-income community, and private community leaders--tripartite boards enable CAAs to allocate resources to complement and coordinate with other programs. No other program provides a stable dynamic platform for sustained community-based creativity and flexibility in addressing the multi-faceted problem of poverty.</p> <p><i>Evidence:</i> Draft CSBG Statistical Report FY 2001: Chart titled, "FY 2001 CSBG-Funded Local Agency Resources in 49 States, DC, and Puerto Rico (in millions of dollars)" and list of program funding sources. Also, CSBG Act (42 U.S.C. 9901--tripartite Boards)</p> | | | |
| 1.4 | Is the program design free of major flaws that would limit the program's effectiveness or efficiency? | NO | 0% |
| <p><i>Explanation:</i> Current law does not require minimum performance standards of CAAs as a condition of continued funding. In very rare circumstances, States have designated CAAs as deficient and terminated funding to the entity, but only infrequently. As a result, CAAs are a largely static group unchallenged by competitive pressures for continuous performance improvement.</p> <p><i>Evidence:</i> Economic Opportunity Act of 1964; 1981 CSBG Act; CSBG Act reauthorizations in 1984, 1986, 1990, 1994 and 1998.</p> | | | |
| 1.5 | Is the program effectively targeted, so program resources reach intended beneficiaries and/or otherwise address the program's purpose directly? | YES | 20% |
| <p><i>Explanation:</i> Resource targeting is accomplished by needs assessments. Case management intake processes ensure that intended beneficiaries are reached and unintended subsidies are avoided. All of the activities of CSBG-funded community agencies are focused on low-income individuals.</p> <p><i>Evidence:</i> Community Services Block Grant Program (42 U.S.C. 9902 - Definitions..Poverty Line) ; (42 U.S.C. 9908 - Application and Plan); CSBG Statistical Report; sample Intake Form; and sample Needs Assessment Instrument.</p> | | | |
| Section 1 - Program Purpose & Design | | | Score 80% |

| Section 2 - Strategic Planning | | | |
|--|--|--------|-------|
| Number | Question | Answer | Score |
| 2.1 | Does the program have a limited number of specific long-term performance measures that focus on outcomes and meaningfully reflect the purpose of the program? | NO | 0% |
| <p><i>Explanation:</i> A new measure is under development, and may be included in the FY 2005 GPRA Plan. While this measure represents an encouraging step toward a singular national performance indicator, there remain unresolved</p> | | | |

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| | <p>technical concerns with the measure. Most importantly, the developmental measure aggregates some national performance indicators which track absolute numbers and do not measure relative success.</p> <p><i>Evidence:</i> Information Memorandum 49, ROMA Guide: Family Agency Community Outcomes; proposed 2005 GPRA measures; and, National Performance Indicators (draft).</p> | | |
| 2.2 | <p>Does the program have ambitious targets and timeframes for its long-term measures?</p> <p><i>Explanation:</i> Baseline data for newly developed long-term targets are being collected.</p> <p><i>Evidence:</i> Draft U.S. HHS FY 2005 OMB Request for Information and GPRA Performance Plan - Administration for Children and Families - Community Services Block Grant Section.</p> | NO | 0% |
| 2.3 | <p>Does the program have a limited number of specific annual performance measures that demonstrate progress toward achieving the program's long-term measures?</p> <p><i>Explanation:</i> A new measure is under development, and may be included in the FY 2005 GPRA Plan. States and local agencies report outcomes for six long-term national goals that reflect the needs of particular service areas. While various outcomes for each goal are reported by States and local agencies annually, there is no set of national outcome measures for which all states and local agencies must report.</p> <p><i>Evidence:</i> Annual Report of Performance Outcomes from the CSBG Program and Proposed 2005 GPRA measures.</p> | NO | 0% |
| 2.4 | <p>Does the program have baselines and ambitious targets and timeframes for its annual measures?</p> <p><i>Explanation:</i> While targets have been established for existing CSBG GPRA performance measures, actual performance exceeds even future targets by such an extent that they are not ambitious.</p> <p><i>Evidence:</i> U.S. HHS FY 2004 OMB Request for Information and GPRA Performance Plan-ACF - Community Services Block Grant Section and Proposed 2005 GPRA measures.</p> | NO | 0% |
| 2.5 | <p>Do all partners (including grantees, sub-grantees, contractors, cost-sharing partners, etc.) commit to and work toward the annual and/or long-term goals of the program?</p> <p><i>Explanation:</i> New long-term and annual measures are under development. While various outcomes for each goal are reported by States and local agencies annually, there is no set of national outcome measures for which all states and local agencies must report. However, CSBG performance measurement strategies (Results Oriented Management and Accountability, or ROMA) were initiated in 1994, and became mandatory on October 1, 2001. All States met that statutorily required deadline, and the first report of CSBG outcomes was released in early 2003. ROMA was developed collaboratively among Federal, State and local agencies over a nine year</p> | NO | 0% |

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|---------------------------------------|---|-------|-----|
| | <p>period.</p> <p><i>Evidence:</i> Annual Report of Performance Outcomes from the CSBG Program, Regional Meeting Summary: ROMA Implementation by 2003, Information Memorandum 49 (specifies the requirements for undertaking performance measurement and reporting) and proposed FY2004 specifications for CSBG reauthorization.</p> | | |
| 2.6 | <p>Are independent and quality evaluations of sufficient scope and quality conducted on a regular basis or as needed to support program improvements and evaluate effectiveness and relevance to the problem, interest, or need?</p> <p><i>Explanation:</i> There are currently no independent evaluations for CSBG. No funds are appropriated for this purpose. However, data is collected annually from States on both program inputs (resources, services) and outputs (impact on beneficiaries and communities). States may use this information to assess local agency effectiveness.</p> <p><i>Evidence:</i> Program Implementation Assessment Instrument; CSBG Act (42 U.S.C. 9913 - Training, Technical Assistance and Other Activities); and CSBG Act (42 U.S.C. 9914 - Monitoring of Eligible Entities).</p> | NO | 0% |
| 2.7 | <p>Are Budget requests explicitly tied to accomplishment of the annual and long-term performance goals, and are the resource needs presented in a complete and transparent manner in the program's budget?</p> <p><i>Explanation:</i> CSBG annual budget requests, as do those of most all ACF programs, include a budget linkage table that displays outputs and outcomes associated with the aggregate program budget authority. This table does not provide a presentation that makes clear the impact of funding, policy, or legislative decisions on expected performance nor does it explain why the requested performance/resource mix is appropriate.</p> <p><i>Evidence:</i> CSBG Act (42 U.S.C. 9917 - Accountability and Reporting Requirements).</p> | NO | 0% |
| 2.8 | <p>Has the program taken meaningful steps to correct its strategic planning deficiencies?</p> <p><i>Explanation:</i> The CSBG program has been engaged in a nine year initiative to use performance based management as a tool for strategic program planning, programming and accountability. New national measures are currently being developed for CAAs. OCS is undergoing a restructuring process to better address the needs of all OCS programs. Finally, the reauthorization proposal will strengthen outcome reporting.</p> <p><i>Evidence:</i> Information Memorandum 49; Regional Meeting Summary: ROMA Implementation by 2003; CSBG National Performance Indicators (draft); and OCS Restructuring Plan (to be published in the Federal Register).</p> | YES | 12% |
| Section 2 - Strategic Planning | | Score | 12% |

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|--------------------------------|
| Section 3 - Program Management |
|--------------------------------|

| Number | Question | Answer | Score |
|--------|--|--------|-------|
| 3.1 | <p>Does the agency regularly collect timely and credible performance information, including information from key program partners, and use it to manage the program and improve performance?</p> <p><i>Explanation:</i> The CSBG program utilizes annual program output and performance information from States and local CSBG-funded community agencies to identify training and technical assistance needs. A number of States now use performance-based management and outcome information to guide State and local CSBG strategic planning, programming, evaluation and reporting.</p> <p><i>Evidence:</i> CSBG Statistical Report; Annual Report of Performance Outcomes from the CSBG Program and OCS Restructuring Plan</p> | YES | 11% |
| 3.2 | <p>Are Federal managers and program partners (grantees, subgrantees, contractors, cost-sharing partners, etc.) held accountable for cost, schedule and performance results?</p> <p><i>Explanation:</i> The Director of OCS and other ACF managers are held accountable for their performance through their Employee Performance contract for cost, schedule, and performance results, as required by GPRA. CAA Executive Directors are held accountable by tripartite Boards for cost, schedule, and achieving program outcomes through annual performance appraisals.</p> <p><i>Evidence:</i> CSBG Act (42 U.S.C. 9913 - T/A); CSBG Act (42 U.S.C. 9914 - Monitoring) ; CSBG Act (U.S.C. 9915 - Corrective Action); OCS Director's performance plan; Mid-Iowa Comm. Action's (MICA) Performance Accountability Plan; MICA's Qtrly. Personal Development Plan; State/local Audits; and CAA Executive Handbook pgs. 96-98.</p> | YES | 11% |
| 3.3 | <p>Are all funds (Federal and partners') obligated in a timely manner and spent for the intended purpose?</p> <p><i>Explanation:</i> CSBG funds are allocated to States by formula. States must "pass through" at least 90% of their allocation to eligible local entities based on distribution formulae based on census or other demographic data concerning poverty. With few exceptions, funds are allocated to local eligible entities as soon as they are made available, and in accordance with a State-approved program plan.</p> <p><i>Evidence:</i> Financial Status Reports (SF 269A); Grant Award Letters; disbursement summaries; FY 2001 Statistical Report Highlights; Payment Center "draw down" data from 1993 to 2002; Subgrantee (Sandhills CAP) contract with the State of NC and State monitoring review form; Subgrantee Project Review Report; A-133 Compliance Supplement for CSBG (CFDA 93.569); & State/local Audits.</p> | YES | 11% |
| 3.4 | <p>Does the program have procedures (e.g., competitive sourcing/cost comparisons, IT improvements, appropriate incentives) to measure and achieve efficiencies and cost effectiveness in program execution?</p> <p><i>Explanation:</i> While the program does have procedures in place to achieve</p> | NO | 0% |

efficiencies and cost effectiveness, there are no procedures in place by which to measure such efficiencies at the program level. For example, competitive sourcing and IT improvements are used to improve efficiency and cost effectiveness in program execution. OCS plans to include a CSBG financial resource leveraging efficiency measure to the FY 2005 GPRA Plan.

Evidence: FY 2004 OMB Request for Info. & GPRA Perf. Plan-ACF - CSBG Section; CT's IT sharing plan; CSBG Act (42 U.S.C. 9901-Sec 672(2)(E)); "MMDB" Team and report at: www.roma1.org/documents/mmdb/decision-makers-guide.pdf; History, Purpose & Perspective Info. Sheet; ACF Competitive Sourcing Plan; and OCS MIS Plan.

3.5 **Does the program collaborate and coordinate effectively with related programs?** YES 11%

Explanation: CSBG work is unique by virtue of its extensive Federal, State and local coordination and collaboration in response to multiple needs of low-income households. For example, some 37% of Head Start classes and more than 40% of LIHEAP programs are managed by CAAs. These and other coordinated efforts secure and maintain employment, education, income management, housing, emergency services, nutrition, health and other services that respond to the needs of low-income individuals and families. Without such partnerships, community action would not be able to achieve and sustain favorable family, community and agency outcomes.

Evidence: Child Support Memorandum of Understanding (MOU); Head Start (2 MOU's); IRS (2 MOU's); HUD Lead Hazard Control (MOU); DOL Workforce Investment Act Partnership; CSBG Act (42 U.S.C. 9908 - Application and Plan -Assurances 5&6); and, FY 2000 CSBG Statistical Report pages 49 through 68.

3.6 **Does the program use strong financial management practices?** YES 11%

Explanation: ACF has received a clean audit opinion from FY 1999 to 2002 (the last stand alone audit conducted), identifying no material internal control weaknesses. However, State agencies have primary responsibility for insuring the integrity and strength of financial management of funds by local CSBG grantees. States practices include: conducting periodic on-site review of financial management practices and recordkeeping/reporting practices of local agencies as part of routine program monitoring; receipt and review of interim and final expenditure reports submitted by local agencies; and periodic independent financial audits of local agencies, for not only the CSBG program but also for other programs administered by local CAAs. Finally, because local agencies have unique vulnerabilities, HHS has utilized its discretionary grant authority to provide special assistance to States and local agencies focused on continuous monitoring and improvement of financial management.

Evidence: CSBG T/TA Program Announcements; Program Implementation Assessments (PIA); CSBG Act: (42 U.S.C. 9913 - T/TA); (42 U.S.C. 9914 - Monitoring); (42 U.S.C. 9915 - Corrective Action); (42 U.S.C. 9916 - Fiscal Controls); CAA Executives' Handbook; State/local Audits; ACF audits; Federal Financial Management Improvement Act; and, ACF Audit Workgroup Questionnaire.

| | | |
|---|---|-----------|
| 3.7 | Has the program taken meaningful steps to address its management deficiencies? | YES 11% |
| <p><i>Explanation:</i> Federal, State and local CSBG authorities utilize a variety of mechanisms to identify and correct management deficiencies, including: annual on-site monitoring of local programs that focuses on program and management requirements of the law; national leadership training and inservice programs for local managers; intensive on-site remediation of significant deficiencies within at-risk agencies; and the ongoing effort to establish linkages between management protocols and program performance measurement and reporting.</p> <p><i>Evidence:</i> CSBG T/TA Program Announcements; Program Implementation Assessments; CSBG Act: (42 U.S.C. 9913 - T/TA); (42 U.S.C. 9914 - Monitoring); (42 U.S.C. 9915 - Corrective Action); (42 U.S.C. 9916 - Fiscal Controls) and CSBG Report to Congress.</p> | | |
| 3.BF1 | Does the program have oversight practices that provide sufficient knowledge of grantee activities? | YES 11% |
| <p><i>Explanation:</i> Oversight is achieved through a variety of Federal and State mechanisms, including application review, annual on-site monitoring, fiscal reports and audits, performance measurement and reporting, and technical assistance.</p> <p><i>Evidence:</i> Program Assessments (PIA); CSBG Act: (42 U.S.C. 9908 - State Plan, 9913 - T/TA, 9914 - Monitoring, 9915 - Corrective Action, 9916 - Fiscal Controls); ACF Audit Questionnaire; subgrantee Project Review Report; State Internal Review Form; State Grantee Review & Assmt. Report; and, State/local audits.</p> | | |
| 3.BF2 | Does the program collect grantee performance data on an annual basis and make it available to the public in a transparent and meaningful manner? | YES 11% |
| <p><i>Explanation:</i> As required by the CSBG Reauthorization Act of 1998, all States submitted ROMA-generated performance data for Fiscal Year 2001. A report of this data has been published and has been made available to the public both in print and electronically.</p> <p><i>Evidence:</i> Annual Report of Performance Outcomes from the CSBG Program and CSBG Statistical Report.</p> | | |
| Section 3 - Program Management | | Score 89% |

| Section 4 - Program Results/Accountability | | | |
|---|---|--------|-------|
| Number | Question | Answer | Score |
| 4.1 | Has the program demonstrated adequate progress in achieving its long-term outcome performance goals? | NO | 0% |
| <p><i>Explanation:</i> As noted in 2.1, these measures are under development, and as such, there is not yet any progress toward the goals. CSBG has successfully installed a universal system for tracking and reporting performance outcomes at the individual, local agency, State, and Federal</p> | | | |

| | | | |
|---|---|-------|----|
| | <p>levels. The program is changing its GPRA measures to be more outcome oriented and the Administration's proposed reauthorization language calls for more accountability at the grantee level.</p> <p><i>Evidence:</i> Information Memorandum 49; Annual Report of Performance Outcomes from the CSBG Program; U.S. HHS FY 2004 OMB Request for Information and GPRA Performance Plan -ACF - CSBG Section; proposed FY 2004 Specifications for CSBG reauthorization; and, proposed FY 2005 GPRA measures.</p> | | |
| 4.2 | <p>Does the program (including program partners) achieve its annual performance goals?</p> <p><i>Explanation:</i> As noted in 2.3, these measures are under development, and as such, there is not yet any progress toward the goals.</p> <p><i>Evidence:</i> Draft HHS FY 2005 OMB Request for Information & GPRA Performance Plan - ACF - CSBG Sec.; ROMA Guide: Family Agency Comm. Outcomes; and, FY 2004 Performance Plan/FY 2002 Performance Report (GPRA).</p> | NO | 0% |
| 4.3 | <p>Does the program demonstrate improved efficiencies or cost effectiveness in achieving program performance goals each year?</p> <p><i>Explanation:</i> As noted in 3.4, while the program does have procedures in place to achieve efficiencies and cost effectiveness, there are no measures in place by which to capture such efficiency gains.</p> <p><i>Evidence:</i> Draft U.S. HHS FY 2005 OMB Request for Information and GPRA Performance Plan - Administration for Children and Families - CSBG Section.</p> | NO | 0% |
| 4.4 | <p>Does the performance of this program compare favorably to other programs, including government, private, etc., that have similar purpose and goals?</p> <p><i>Explanation:</i> CSBG is the only program that has the statutory mission and flexibility to accomplish multiple tasks through varied strategies and partnerships. No other program corresponds to CSBG in terms of its broad anti-poverty mission and goals. CSBG effectiveness is measured not only by the services directly provided, but more importantly, by revitalizing low-income communities.</p> <p><i>Evidence:</i></p> | NA | 0% |
| 4.5 | <p>Do independent and quality evaluations of this program indicate that the program is effective and achieving results?</p> <p><i>Explanation:</i> There are currently no independent evaluations for CSBG. No funds are appropriated for this purpose. However, an HHS grant supports an annual assessment and reporting of CSBG performance outcomes.</p> <p><i>Evidence:</i> Annual Report of Performance Outcomes from the CSBG Program.</p> | NO | 0% |
| Section 4 - Program Results/Accountability | | Score | 0% |

- View this [program's assessment summary](#).
- Visit [ExpectMore.gov](#) to learn more about program assessment and improvement by the Federal Government.
- [Learn more](#) about detailed assessments.

Last updated: 01262007.2003FALL

Attachment 2

OCS – IM 94

**COMMUNITY SERVICES BLOCK
GRANT PROGRAM**

Information Memorandum

**U.S. Department of Health and Human Services
Administration for Children and Families
Office of Community Services
Division of State Assistance
370 L'Enfant Promenade, S.W.
Washington, D.C. 20447
<http://www.acf.gov/programs/ocs/csbg>**

Transmittal No. 94

Date: January 13, 2006

To: State CSBG Lead Agencies
State Community Action Associations

From: Director of State Assistance
Office of Community Services

Subject: Fiscal Year 2006 Head Start Triennial and Follow-Up Reviews in
Community Action Agencies – Immediate and Long-Term Opportunities

Purpose

Attached is a list of Head Start programs in Community Action Agencies that will be scheduled for triennial, first year or follow-up reviews in Fiscal Year 2006.

Head Start programs are required to be in full compliance and provide quality services at all times. Knowing in advance the specific Head Start programs that will be monitored this year for compliance provides an opportunity for State and local community action officials to reinforce the importance of effective management systems, strong internal controls and informed governing bodies. As part of our program oversight, we should implement on-going targeted and system-wide actions to assure that community action agencies are properly managed, and that they achieve life-changing outcomes for low-income people.

This memorandum recommends:

- Immediate action by State CSBG lead agencies, State Community Action Associations, and affected local agencies to assure that Community Action Agencies are operating high quality Head Start programs that comply with all applicable regulations, particularly in the areas of internal controls, effective management and informed governance.; and

- Development of longer-term State and local strategies to assure continued administrative and fiscal integrity, program effectiveness, and accountability among all programs administered by Community Action Agencies.

Background

As you know, the two Federal agencies that administer the CSBG and Head Start -- the Office of Community Services (OCS) and the Head Start Bureau -- have been working over the past several years to improve program integrity, effectiveness, and accountability of their respective programs. OCS has sought to strengthen program monitoring and oversight through its block grant relationship with States. The Head Start Bureau has implemented significant changes in monitoring to improve upon many aspects of the monitoring process. These changes are detailed in the FY 06 PRISM GUIDE available at www2.acf.dhhs.gov/programs/hsb/.

Sixty-percent of Community Action Agencies administer Head Start programs and serve as the grantee for over five hundred Head Start programs throughout the country. Community Action Agencies operate approximately 30% of all federally funded Head Start programs. OCS and the HSB recognize and reaffirm the intentional historic pairing of community action and Head Start because of their common purpose, shared families, and complimentary outcomes. It also recognizes that Head Start is often the largest program within Community Action Agencies and that the continued viability of the agency as a whole may ultimately be reflected in the integrity and soundness of its administration of Head Start.

One result of the collaboration between community action and Head Start has been improved communication among Federal, regional, State, and local officials involved in program oversight and continuous improvement. Also sharing of relevant Head Start monitoring results and other pertinent information can better inform and influence the types of technical assistance needed to support program improvement as well as identify high quality Community Action Agencies that can serve as models or mentors for other community action agencies.

Distribution of the list of community action agencies scheduled for Head Start triennial, first year or follow-up program reviews in Fiscal Year 2006 provides an opportunity for State CSBG Lead Agencies and State Community Action Associations to reinforce the importance that Community Action Agencies have on-going systems that enable the agency to comply with Head Start administrative, fiscal, and Head Start Program Performance Standards..

In addition, it provides yet another opportunity to help improve community action agency compliance with program coordination requirements and expectations described in Section 672 of the Community Services Block Grant Act:

- (A) the strengthening of community capabilities for planning and coordinating the use of a broad range of Federal, State, local, and other assistance (including

private resources) related to the elimination of poverty, so that this assistance can be used in a manner responsive to local needs and conditions; and

(B) the organization of a range of services related to the needs of low-income families and individuals, so that these services may have a measurable and potentially major impact on the causes of poverty in a community and may help the families and individuals to achieve self-sufficiency.

Recommendations for Immediate Action

Fiscal Year 2006 Triennial or First Year Reviews

At a minimum, OCS urges State CSBG Lead Agencies and State Community Action Associations to work collaboratively with local community action agencies scheduled for a Head Start triennial or first year review in Fiscal Year 2006 to:

Review Assessment of Key Agency Policies, Procedures and Practices

State CSBG Lead Agencies and/or State community action associations should encourage local agencies with Head Start programs to conduct their annual Head Start self assessments and ensure that the community assessment contains updated and accurate information, and that agency Head Start programs have on-going systems of oversight and monitoring. The tripartite boards and executive staff of local community action agencies should also be encouraged to remain knowledgeable and involved in Head Start program assessment, monitoring, and improvement. The processes – self assessment, community assessment and on-going monitoring provide opportunities for agencies to identify Head Start program strengths and areas that warrant improvement. Agencies in the past have often focused their energies on “preparing for the monitoring test” instead of implementing ongoing systems that identify areas needing improvement and that sustain the actions taken to correct weaknesses.

Through local agency implementation of an annual Head Start self assessment, community assessment and on-going monitoring, agency tripartite boards and community action executive staff will be able to assess the current status of key agency-wide or Head Start-specific administrative and program policies, procedures, and practices, including but not limited to:

- Coordination and responsible governance among agency tripartite boards, Head Start Policy Councils and advisory committee(s);
- Recruitment, enrollment, and eligibility of Head Start program participants;
- Agency-wide or Head Start-specific financial status, management and accountability policies and procedures, including those related to establishing and maintaining fund accounts, disbursements, records, reports, and audits;
- Staffing procedures and requirements, including recruitment, hiring, composition, qualifications and certification, training, retention and/or dismissal;

- Appropriateness and completeness of program services to eligible children and families;
- Facility requirements – health and safety;
- Information collection and reporting – service reporting and accountability/evaluation reports for child and family outcomes;
- Relationship of Head Start programs and services to other programs and services administered by the agency and/or other service providers in the community. For example, is Head Start part of an agency-wide strategy or strategic plan to reduce poverty or promote self-sufficiency?

Grantee Review Identification and Resolution of Issues

If potential compliance or program performance issues are identified in the assessments described above, OCS recommends that State CSBG Lead Agencies and State community action associations encourage and help where possible local agency executive directors and Head Start program directors resolve those issues within a reasonable time frame so that the corrective actions can be sustained over time. It is important to stress that quick fixes to identified problems typically result in a reoccurrence of the problems. Most areas needing improvement are often linked to major systems that often require thoughtful planning and time to implement needed changes. An agency's ongoing planning should include corrective action or improvement plans as needed. Agencies that assume a proactive role in addressing their identified weaknesses through a thoughtful corrective or program improvement plan will be better positioned to sustained quality services.

It is important to keep in mind that Federal Head Start monitoring is done on a triennial schedule. Due to rapid changes within communities today including natural disasters, agencies that do not conduct rigorous on-going monitoring may find that the federal monitoring team uncovers a serious weakness or deficiency that should have been discovered by the agency.

Longer-Term Opportunities and Strategies

Beyond the immediate and targeted support to community action agencies scheduled for Head Start reviews during this fiscal year, the Community Services Network must continue to focus its efforts on strengthening overall agency governance and administration, fiscal control, program effectiveness and accountability to assure capacity to comply with all program requirements of the various programs administered by the agency.

The continued presence of Head Start among programs administered by community action agencies, and all the benefits to low-income people that can be derived from that association, will depend upon the resolve of Federal, regional, and State officials of both programs to ensure that agencies are held accountable to meet all applicable regulations

and that each entity with oversight authority does its best to carry out its oversight responsibilities in an objective and timely manner. Cooperation and coordination among Head Start and community action administrators and informed and active governing boards at the local level are also key factors to positive outcomes.

Strategic Planning and Program Coordination

OCS encourages State CSBG Lead Agencies and State Community Action Associations to continue to provide on-going training and technical assistance to local agencies that focuses on improving strategic planning and coordination among all programs and services they administer, particularly Head Start. Agencies that choose to operate each of their programs separately without a coordinated strategy to address the multi-faceted causes and conditions of poverty among low-income people and communities are meeting neither the letter nor spirit of the CSBG Act. And, these agencies are much less likely to be helping low-income people out of poverty.

Program Administration and Financial Management

On-going training and technical assistance is needed to assure that local community action agencies have the capacity to administer multiple programs in ways that comport with the fiscal and administrative requirements of each program. Central administration and financial management of various Federal, State, local, and privately-funded programs is a unique hallmark of community action and a powerful rationale for its preservation. It is not easy to operate many programs with varying requirements but we do it well in most places. We need to do it well everywhere.

OCS has created and supported national training and technical assistance resources that focus on agency administration and financial management. These resources continue to be available to State and local community action agencies. OCS encourages State CSBG Lead Agencies and State Community Action Associations to utilize these resources.

Tripartite Board Training and Empowerment

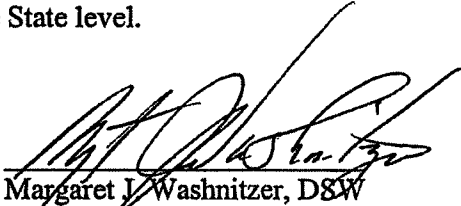
Community Action tripartite boards are responsible for overseeing the operation of the entire agency and all its programs, including Head Start. In order to help safeguard the integrity of community action agencies, tripartite boards must have the capacity to carry out their oversight responsibilities and need training and technical assistance to, at a minimum, assess, approve, and monitor:

- Annual and long-range agency strategic plans;
- Agency administrative policies and procedures for all programs;
- Agency financial management policies, procedures, and practices for all programs;
- Agency program design and performance;
- Agency relationships with other organizations in the community; and
- Agency compliance with applicable Federal, State, and local program requirements.

OCS recommends that State CSBG Lead Agencies and State Community Action Associations help local agencies coordinate the work of agency-wide tripartite boards with the governing or advisory boards and committees of other programs administered by the agency, particularly Head Start. Both community action and Head Start require strong parent/client participation in local program governance and oversight. Shared membership or joint meetings of the community action agency tripartite board and the Head Start Policy Council may strengthen assessment of family and community needs, help achieve consensus on an overall agency response to those needs, provide for closer and more effective oversight of agency administration and financial controls, and improve programs and outcomes for clients of all programs administered by the agency.

One Agency, One Mission

Finally, the most effective way to ensure sustained health among all of the programs that comprise community action, especially CSBG and Head Start, is an understanding that community action is one agency with one mission – to reduce poverty among low-income people and improve opportunities for their success in their communities. To be effective, all staff, all programs, all board members, and all community partners need to work in unison toward this common mission and goal. Community Action Agencies with multiple programs throughout the country have moved to reaffirm their singular antipoverty purpose and identity. State CSBG Lead Agencies and State Community Action Associations are encouraged to support and reinforce this Network-wide transformation with training and technical assistance, and by achieving similar congruity of purpose and action across programs at the State level.



Margaret J. Washnitzer, DSW
Director of State Assistance
Office of Community Services

Attachment 3
WV GOEO Monitoring Tool

CAA Monitoring Desk Audit

Complete prior to conducting on-site monitoring

Governance

| Indicator | What I Should Look For | Issues, Concerns to Investigate |
|---|---|--|
| <p>1.1 Board members were elected in accordance with grantee bylaws, CSBG legislation and regulations. Authority Public Law 105-285, 676B(a): Information Memorandum #82. Significance CSBG requires board have a tripartite structure and provide for democratic election of low income representatives. <input type="checkbox"/> Warning Sign (Check if true) Failure to comply with these requirements would be grounds of findings of non-compliance and possible decertification.</p> | <p>Bylaw articles defining</p> <ul style="list-style-type: none"> • the tripartite board structure • democratic selection methods for low income members • methods for soliciting and seating elected officials or their representatives • methods for recruiting public sector members • methods for member removal and filling of vacancies • Date of last revision | |
| <p>1.2 All board meetings in the past 12 months were conducted after determining a quorum. Authority State nonprofit corporation law requirements on minimum number of board members and requirements for establishing a quorum. Significance Conducting organizational business in the absence of a quorum renders such decisions invalid. <input type="checkbox"/> Warning Sign (Check if true) See Significance.</p> | <p>Examine meeting minutes for evidence of:</p> <ul style="list-style-type: none"> • List of seated members present and absent • Statement of a quorum being established (or not) | <p># meetings in last 12 months: _____ # meetings without quorum present: _____ Quorum (or lack of) documented in minutes: _____</p> |
| <p>1.3 Minutes clearly document board discussions and decisions. Authority State nonprofit corporation law. Significance Minutes constitute the official, legal record of the acts of the corporation. <input type="checkbox"/> Warning Sign (Check if true) Ambiguous or</p> | <p>Verify that the board minutes for past 12 months:</p> <ul style="list-style-type: none"> • State motions so their intent is clear • Record the names of persons offering and seconding motions, abstaining or voting no | |

CAA Monitoring Desk Audit

Complete prior to conducting on-site monitoring

| Indicator | What I should Look For | Issues, Concerns to Investigate |
|---|--|---|
| <p>incomplete information in minutes prevents members and other parties from understanding the actions and decisions of the board.</p> | <ul style="list-style-type: none"> Summarize topics discussed without excessive detail Lists names of members, staff, visitors present and of members absent | |
| <p>1.4 The board had more than 70% membership participation in the past twelve months. Significance Vacant seats or nonparticipating members limit the representativeness of a board. <input type="checkbox"/> Warning Sign (Check if true) Low participation may result in official decisions being made by a minority of board members.</p> | <p>Compute this ratio: Sum of attendees at meetings in last 12 months</p> <hr/> <p># of board seats * number of meetings in last 12 months</p> <p>Evidence in minutes of discussions or actions taken to address absenteeism</p> | <p>% participation in last 12 months: _____ Member participation documented by sign-in sheets, roster checklist, with name of person verifying quorum: _____ Average # meetings positions are vacant: _____</p> |
| <p>1.5 The board is knowledgeable about the statutory and regulatory requirements of its work. Authority OCS Information Memorandum #82 Significance Board members must understand its obligations to "play by the rules" contained in legislation, OMB Financial Management circulars, grants, contracts, etc. <input type="checkbox"/> Warning Sign (Check if true) Failure to comply with these requirements can lead to audit findings, monitoring findings, disallowed costs, and possible loss of funding.</p> | <p>Financial Policies and Procedures Manual Bylaws checked against the requirements of your state's nonprofit corporation law Personnel Policies and Procedures Minutes contain references to periodic review and updating of these documents</p> | |
| <p>1.6 The board maintains current organizational documents. Authority OCS Information Memorandum #82 Significance The board must understand its obligations to be current in its organizational documents.</p> | <p>Documents on file in state office: - articles of incorporation - board's bylaws - conflict of interest declaration - board member code of ethics</p> | |

CAA Monitoring Desk Audit

Complete prior to conducting on-site monitoring

| Indicator | What I should Look For | Issues, Concerns to Investigate |
|--|---|---------------------------------|
| <p><input type="checkbox"/> Warning Sign (Check if true) Failure to comply with these requirements can lead to ineligibility for funding, legal liabilities, lack of clarity about the organization's mission.</p> <p>1.7 Board members are knowledgeable about board structure and functioning. Authority OCS Information Memorandum #82 Significance The board should be well informed about how the board is organized.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Lack of clarity and understanding of the bylaws can lead to improper or illegal actions by the board.</p> | <p>Documentation of board training activities?</p> | |
| <p>1.8 The board leads organizational mission definition, long- and short-range planning. Authority OCS Information Memorandum #82 Significance The board is responsible to set, protect, and advance the organization's strategic direction.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Failure to set, protect, and advance the organization's strategic direction may result in a lack of focus and purpose in the organization, leading to involvement in unsustainable activities.</p> | <p>Documents on file in state office:</p> <ul style="list-style-type: none"> - Community assessment (Date?) - Strategic plan - Values statement - Mission statement <p>Evidence of how board members participate in regular long-range, or strategic, planning, in re-thinking the organization's values and mission statement.</p> <p>Has the organization found itself involved in programs or activities that it couldn't maintain?</p> <p>Has the organization found itself involved in programs or activities that didn't seem to "fit" its mission?</p> | |

CAA Monitoring Desk Audit

Complete prior to conducting on-site monitoring

| Indicator | What I should Look For | Issues, Concerns to Investigate |
|--|--|--|
| <p>1.9 The board carries out its responsibility to approve and oversee the organization's administrative and financial management policies and procedures. Authority OCS Information Memorandum #82 Significance The board needs to be clear about its responsibilities to set agency policies and to verify their implementation. <input type="checkbox"/> Warning Sign (Check if true) Failure to adopt and follow policies and procedures can expose the organization to audit and monitoring findings, as well as possible legal liabilities.</p> | <p>Evidence in minutes of board review CAA financial policies and procedures? Evidence in minutes that CAA obtained outside expert advice when revising financial policies and procedures? Did the board receive a direct report on the last annual agencywide audit?</p> | |
| <p>1.10 The board carries out its responsibility to approve and oversee the organization's personnel/human resources policies and procedures. Authority OCS Information Memorandum #82 Significance The board needs to be clear about its responsibilities to set agency policies and to verify their implementation. <input type="checkbox"/> Warning Sign (Check if true) Failure to adopt and follow policies and procedures can expose the organization to audit and monitoring findings, as well as possible legal liabilities.</p> | <p>Evidence in minutes of board review of CAA personnel policies and procedures? Evidence in minutes that CAA obtained outside expert advice when revising personnel policies and procedures?</p> | |
| <p>1.11 The board conducts systematic oversight of its programs and services. Authority OCS Information Memorandum #82 Significance The board is responsible for ensuring that all programs and services are operated in</p> | <p>Evidence in minutes of board review of - grants and contracts, including their budgets Do- funder reports on monitoring of CAA</p> | |

CAA _____ Date _____

Monitor _____

CAA Monitoring Desk Audit

Complete prior to conducting on-site monitoring

| Indicator | What I should Look For | Issues, Concerns to Investigate |
|---|---|---------------------------------|
| <p>compliance.</p> <p><input type="checkbox"/> Warning Sign (Check if true) The board has final legal responsibility for all actions of the organization.</p> | <p>programs?</p> <ul style="list-style-type: none"> - action plans to correct any areas of noncompliance or deficiency identified in funder monitoring | |
| <p>1.12 The board carries out its responsibilities for employing, leading, and evaluating the executive director.</p> <p>Authority OCS Information Memorandum #82</p> <p>Significance The board needs to be clear about its responsibilities toward the executive.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Lack of clarity and understanding of the board's role can lead to executive dominance of the board and/or divergence from the CAA's mission and strategic plan.</p> | <ul style="list-style-type: none"> - Executive director contract - written goals and objectives for the current year - performance evaluation instrument | |

Do you regard this CAA's as at risk in governance? Justify.

What corrective actions must the CAA take to normalize its governance? Describe the resulting condition and what evidence you will accept of proof of achievement of that condition?

Do you recommend strengthening particular governance practices? List.

CAA Monitoring Desk Audit

Complete prior to conducting on-site monitoring

Financial Management and Condition

| Indicator | What I Should Look For | Issues, Concerns to Investigate |
|--|--|---------------------------------|
| <p>2.1 Bank statements are reconciled monthly against the general ledger. Authority ?. Significance Sound financial management required accurate, current information about financial status. <input type="checkbox"/> Warning Sign (Check if true) Unless bank statements are reconciled to the general ledger within 30 days of receipt, financial information can not be treated as timely or accurate.</p> | | |
| <p>2.2 Grantee uses a single set of financial management policies and procedures. Authority Citation of statutory and/or regulatory requirement that must be met. Significance This is an OMB Circular requirement. Programs may have additional or more stringent requirements but should never be excepted from general policies or procedures. <input type="checkbox"/> Warning Sign (Check if true) An agency without written, board-approved financial management policies and procedures—that they actually follow—cannot claim to have adequate internal controls. Procedures that are not uniformly applied cannot be said to be adequately implemented. This will lead to adverse audit reports.</p> | <p>Financial policies and procedures on file in state office: Yes No</p> | |
| <p>2.3 The board approves all organizational obligations. Authority Citation of statutory and/or regulatory requirement that must be met. Significance The board holds ultimate legal responsibility for the organization. Any agreement that creates a liability for the grantee needs to be approved by the board.</p> | | |

CAA Monitoring Desk Audit

Complete prior to conducting on-site monitoring

| Indicator | What I Should Look For | Issues, Concerns to Investigate |
|---|--|---------------------------------|
| <p><input type="checkbox"/> Warning Sign (Check if true) The board needs to be aware of significant commitments made to other parties. The viability or existence of the organization could be threatened if it is unable to meet its obligations.</p> <p>2.4 The board and program directors receive timely and accurate monthly financial statements. Authority Citation of statutory and/or regulatory requirement that must be met. Significance Up-to-date financial information is essential to understanding the current and future well-being of the organization.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Inaccurate and/or out of date financial information could lead to over- or under-spending of budgets, leading to possible findings of deficiency, noncompliance, funding reduction, or defunding, leaving the organization with obligations it might have to meet from unrestricted funds.</p> | <p>Evidence in minutes of a consistent pattern of board approval of major organizational obligations.</p> <p>Specific provisions defining obligations the board must approve in:</p> <ul style="list-style-type: none"> - bylaws - financial policies and procedures - executive director's contract - other policies and procedures | |
| <p>2.5 The board receives a reconciled Balance Sheet twice a year. Authority Citation of statutory and/or regulatory requirement that must be met. Significance This document depicts the overall well-being of the organization, not just of individual accounts. It is a primary tool for boards to identify changes in the global viability of the organization. An effective finance director should be able to produce a balance sheet at any time and explain and justify every number on it.</p> <p><input type="checkbox"/> Warning Sign (Check if true) A negative assets to liabilities ratio means the organization could not clear all its debts by liquidating all its assets. Rapid changes (particularly toward declining or negative</p> | | |

CAA Monitoring Desk Audit

Complete prior to conducting on-site monitoring

| Indicator | What I should Look For | Issues, Concerns to Investigate |
|---|--|---------------------------------|
| <p>asset to debt ratios) signal possible loss of financial control and increasing vulnerability or crisis.</p> <p>2.6 Administrative expenses are distributed on the basis of a board-approved cost allocation plan or an approved indirect cost rate. Authority This is an OMB circulars requirement. Significance A consistent set of criteria or justifications must be used to assign administrative costs to funding sources. <input type="checkbox"/> Warning Sign (Check if true) Failure to have and follow an approved cost allocation plan can lead to adverse audits, program monitoring findings of deficiency or noncompliance, reduction or denial of funding, or requirement to repay questioned costs from unrestricted funds.</p> | <p>Copy of indirect cost rate approval OR Copy of board-approved cost allocation plan</p> | |
| <p>2.7 Approved purchasing policies and procedures are consistently followed. Authority This is an OMB circular requirement. Significance Adherence to written, approved purchasing procedures provide internal control in an area of financial management easy to abuse. <input type="checkbox"/> Warning Sign (Check if true) Failure to have and follow an approved purchasing policies and procedures can lead to adverse audits, program monitoring findings of deficiency or noncompliance, reduction or denial of funding, or requirement to repay questioned costs from unrestricted funds.</p> | <p>Written, approved purchasing policies and procedures contained in financial policies and procedures</p> | |
| <p>2.8 Reports to funders are submitted accurately and on time. Authority This is a requirement of grants and contracts, as well as OMB circulars. Significance Reports on progress toward program goals and on</p> | <p>History of report filing (+/- due date)</p> | |

CAA _____ Date _____

Monitor _____

CAA Monitoring Desk Audit

Complete prior to conducting on-site monitoring

| Indicator | What I should Look For | Issues, Concerns to Investigate |
|--|------------------------------------|---------------------------------|
| <p>spending compared with budgets are a major tool for staff, the board, and funders to regularly assess grantee performance.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Failure to file accurate and timely reports can lead to adverse audits, program monitoring findings of deficiency or noncompliance, reduction or denial of funding, or requirement to repay questioned costs from unrestricted funds. It is also evidence of lack of management control.</p> <p>2.9 Findings, disallowed costs, qualified opinions, and management advisories cited in audit reports and management letters are promptly corrected.</p> <p>Authority An OMB circular requirement. May also appear in grant and contracts conditions.</p> <p>Significance An audit provides the board with an independent, "outside" and professional opinion on the likely accuracy and trustworthiness of the grantee's financial operations. Auditors can focus the board's attention on internal controls that need strengthening.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Failure to correct such conditions can lead to adverse audits, program monitoring findings of deficiency or noncompliance, reduction or denial of funding, or requirement to repay questioned costs from unrestricted funds. It is also evidence of lack of management control.</p> | <p>Last 3 years' audit reports</p> | |
| <p>2.10 Property and equipment inventories are less than two years old.</p> <p>Authority This is an OMB circular requirement. It may also be a grant/contract condition.</p> <p>Significance Such records are important to document insurance or damage claims, as well as acquisition or disposition and possible</p> | | |

CAA Monitoring Desk Audit

Complete prior to conducting on-site monitoring

| Indicator | What I should Look For | Issues, Concerns to Investigate |
|---|--|---------------------------------|
| <p>"ownership interest" in contract purchased property.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Failure to maintain compliant, timely inventory records can lead to adverse audits, program monitoring findings of deficiency or noncompliance, reduction or denial of funding, or requirement to repay questioned costs from unrestricted funds. It is also evidence of lack of management control.</p> | | |
| <p>2.11 There are no unfunded liabilities.</p> <p>Authority Citation of statutory and/or regulatory requirement that must be met.</p> <p>Significance Such unfunded obligations may shift the asset to liabilities ratio to negative.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Having to meet these obligations may place great strain on the agency's cash management and cash reserves. This may result in spending of grant funds for non-allowable purposes, or necessitate obtaining or increasing a line of credit.</p> | | |
| <p>2.12 Funders have disallowed costs.</p> <p>Authority Grant awards or contracts.</p> <p>Significance Disallowed costs can not be paid from grant/contract funds or be reimbursed to the funder from unrestricted funds.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Having to meet these obligations may place great strain on the agency's cash management and cash reserves. This may result in spending of grant funds for non-allowable purposes, or necessitate obtaining or increasing a line of credit.</p> | Monitoring reports | |
| <p>2.13 Bills and expenses are paid within 30 days of receipt or due date.</p> | Communication with the state office, elected officials | |

CAA Monitoring Desk Audit

Complete prior to conducting on-site monitoring

| Indicator | What I should Look For | Issues, Concerns to Investigate |
|---|---|---------------------------------|
| <p>Authority Citation of statutory and/or regulatory requirement that must be met.</p> <p>Significance Timely payment indicates good cash management and provides documentation for prompt reimbursement claims filing.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Inability to pay obligations timely may indicate cash flow and balance sheet problem—evidence of over-expenditure, non-allowable spending, or use of funds from one program to pay expenses of another.</p> | | |
| <p>2.13 Insurance coverage is appropriate to the nature and financial size of organizational and program activities.</p> <p>Authority OMB Circulars???</p> <p>Significance The CAA can be responsible for damages to third parties accidentally occurring during the normal course of CAA activity.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Most legal fees can not be paid from program funds. Few CAAs have extensive general (unrestricted) funds. Board members and employees need to be protected from such litigation.</p> | <p>CAA's certificates of insurance for all current coverages. (???)</p> <p>Types of insurance to look for:</p> <ul style="list-style-type: none"> - Directors and officers (D&O) - General liability - Umbrella liability - Employment practices liability - Contract or subcontractor liability | |
| <p>2.14 Contractors performing services for the CAA have proper business and other licenses.</p> <p>Authority OMB Circulars???</p> <p>Significance The CAA can be held responsible for damages to third parties resulting from the activity of persons or businesses performing services for the CAA.</p> <p><input type="checkbox"/> Warning Sign (Check if true) The CAA can be sued for damages caused by persons or businesses it has contracted with. Board members and employees should be protected from such litigation.</p> | | |

CAA Monitoring Desk Audit

Complete prior to conducting on-site monitoring

Summary

Do you regard this as a CAA at financial risk? Justify.

What corrective actions must the CAA take to stabilize its financial management or condition? Describe the resulting condition(s) and what evidence you will accept of proof that such condition(s) has been achieved?

What financial management practices do you recommend that the CAA strengthen? List.

Human Resources

| Indicator | What I Should Look For | Issues, Concerns to Investigate |
|---|---|---|
| <p>3.1 Grantee complies with all state and federal regulations contained in the state CSBG plan.</p> <p>Authority These are based in federal and state legislation and regulation.</p> <p>Significance Observing these regulations is a requirement for funding.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Failure to meet these requirements can lead to adverse audits, program monitoring findings of deficiency or noncompliance, delayed, reduced or denied funding, or requirement to repay questioned costs from unrestricted funds. It is also evidence of lack of management control.</p> | <p>Examine the CAA's most recent CSBG funding application.</p> | <p>Verify required informational postings through observation of grantee facilities.</p> <p>Verify existence of appropriate employment policies and procedures and practices.</p> <p>Determine whether grantee has internal grievances or legal proceedings based on any of these requirements.</p> <p>Ask the HR director and executive director about their understanding of these requirements and the degree of grantee's compliance.</p> |
| <p>3.2 The grantee has a board-approved set of employment policies and procedures.</p> <p>Authority text</p> <p>Significance The terms and conditions of employment must be formally established and approved by the board so that all employees can be treated consistently.</p> | <p>Personnel policies and procedures on file in state office? Yes or No Date of last revision</p> | |

CAA Monitoring Desk Audit

Complete prior to conducting on-site monitoring

| Indicator | What I should Look For | Issues, Concerns to Investigate |
|---|---|--|
| <p>current wage comparability study.</p> <p>Authority This is an OMB circular requirement.</p> <p>Significance Pay equity should be based on objective data and a well-defined matrix of job classifications and pay ranges. Such a plan provides the rationale for what employees are paid.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Pay decisions not supported by the pay schedule can result in grievances, complaints, legal actions, and financial obligations to the grantee that must be paid out of unrestricted funds.</p> | | |
| <p>3.6 The grantee has a board-approved fringe benefits plan.</p> <p>Authority text</p> <p>Significance Fringe benefits are important incentives to recruiting and retaining employees. Fringe benefits must be offered equally to all employees. Employees under contract (e.g. executive director, those under a union contract) can be offered different benefits.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Failure to maintain fringe benefits (pay for them), or to provide them unequally, could create legal and financial liabilities for the grantee.</p> | <p>Fringe benefits package described in personnel policies and procedures manual?</p> <p>More than one fringe benefits package?</p> | |
| <p>3.7 Employee performance evaluations are conducted regularly and consistently.</p> <p>Authority text</p> <p>Significance Performance evaluations provide the basis for disciplinary, promotion, reduction in force, and termination decisions. They are an important source of feedback to employees.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Personnel actions unsupported by a history of performance evaluation could be contested by employees, generating legal and financial obligations to the grantee that would have to be paid out of unrestricted funds.</p> | <p>Sample employee performance evaluations used by the grantee in the state office?</p> | |

CAA Monitoring Desk Audit

Complete prior to conducting on-site monitoring

| Indicator | What I should Look For | Issues, Concerns to Investigate |
|---|--|---------------------------------|
| <p>3.8 The grantee benefits from stable management leadership. <i>Authority text</i> Significance Stability in management leadership positions tends toward continuity in grantee operation. <input type="checkbox"/> Warning Sign (Check if true) Changes in management leadership shift leadership attention and energy from program improvement and strategic thinking to training and assimilation of new managers. Frequent changes in leadership (more than one per year or frequent changes in one position) disrupt program management and undermine morale.</p> | | |
| <p>3.9 The grantee has program and/or individual staff development/training plans. <i>Authority A CSBG contractual requirement???</i> Significance Regular, planned training builds employee competencies and improves program performance. Regular training indicates the grantee values employees and has a commitment to high program performance. <input type="checkbox"/> Warning Sign (Check if true) Failure to train employees or to upgrade their job skills indicates organizational indifference to employees and limited commitment to service excellence. Low employee and program performance can lead to adverse monitoring results, up to loss of funding and obligations to repay funders.</p> | <p>Determine whether grantee personnel policies provide for individual development or team training.</p> | |

CAA Monitoring Desk Audit

Complete prior to conducting on-site monitoring

Summary

Do you regard this as a CAA at risk in its human resources practices? Justify.

What corrective actions must the CAA take to normalize/legalize its human resources practices? Describe the resulting condition and what evidence you will accept of proof of achievement of that condition?

What human resources practices do you recommend that the CAA strengthen? List.

Planning

| Indicator | What I Should Look For | Issues, Concerns to Investigate |
|---|--|---------------------------------|
| <p>4.1 Grantee has completed a community assessment within the past three years.</p> <p>Authority A state CSBG requirement (citation)</p> <p>Significance A CAA must understand its community and the populations it serves in order to be responsive to them. It must also understand the resources and network of social service providers in order to assess its most effective role(s) in that network.</p> <p><input type="checkbox"/> Warning Sign (Check if true) CAAs that do not understand their community will likely be perceived as "outsiders," as duplicating services, as unresponsive to the community. Lack of community understanding will limit the CAA's capacity to leverage resources and to focus its efforts where they can have the greatest benefit.</p> | <p>The most recent community assessment prepared by the grantee:</p> <ul style="list-style-type: none"> - Comprehensiveness of topics examined, information collected - Diversity and quality of information collected and considered - Diversity and number of persons who analyzed the information and formulated conclusions and recommendations <p>Verify (minutes) presentation of the current community assessment to and acceptance by committees and board.</p> | <p>SEE 1.</p> |

CAA Monitoring Desk Audit

Complete prior to conducting on-site monitoring

| Indicator | What I Should Look For | Issues, Concerns to Investigate |
|--|--|---------------------------------|
| <p>4.2 The grantee is guided by a strategic plan completed within the last five years.</p> <p>Authority A state CSBG requirement (citation)</p> <p>Significance The approval and use of a strategic plan indicates an organization aware of its priorities and possessing a sense of direction. Strategic plans define the conversation board and staff leadership should be having.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Lack of, or failure to use, a strategic plan indicates the grantee lacks a sense of priorities and is operating reactively and passively. It indicates indifference to the conditions in its community and the needs of the populations it serves.</p> | <p>Verify (minutes, process summaries) the use of the community assessment in development of strategic, CSBG, and program plans.</p> <p>Ask leadership team members and board members about the quality and usefulness of the community assessment.</p> <p>Strategic plan on file at state office?</p> <p>prepared by the grantee for:</p> | |
| <p>4.3 The grantee has implemented state-defined ROMA practices.</p> <p>Authority PL 105-385, 676(b)(II)(D)(12), State CSBG plan and CAA contracts.</p> <p>Significance The Community Services Block grant requires that states and grantees participate in ROMA or some other performance measurement system. Use of a performance measurement system</p> | <p>Strategic plan incorporates the national (ROMA) goals and outcome indicators?</p> <p>Evidence of degree of adoption of WVFA CS information management system?</p> | |

CAA _____ Date _____

Monitor _____

CAA Monitoring Desk Audit

Complete prior to conducting on-site monitoring

| Indicator | What I Should Look For | Issues, Concerns to Investigate |
|---|---|---------------------------------|
| <p>also indicates a CAA's commitment to achievement and documentation of the changes it is able to bring about for families and communities.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Failure to participate in ROMA or other measurement system could lead to adverse monitoring reports and possible delay, denial, and termination of funding.</p> | | |
| <p>4.4 Grantee reports progress on its plans to its board of directors at least semi-annually.</p> <p>Authority text</p> <p>Significance The board of directors can not make informed decisions without accurate and current information about program performance. Reports on that performance need to be frequent and understandable.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Lack of current, accurate program information may lead management and the board to make decisions or commitments they can't follow through on.</p> | <p>Document (minutes) what program progress reports are presented to committees and the board, in what form, and with what frequency.</p> | |

Summary

Do you regard this as a CAA as at-risk in implementation of its planning? Justify.

What corrective actions must the CAA take to stabilize its planning practices? Describe the resulting condition(s) and what evidence you will accept as proof such condition(s) have been achieved?

What planning practices do you recommend that the CAA strengthen? List.

CAA Monitoring Desk Audit

Complete prior to conducting on-site monitoring

Services

| Indicator | What I should Look For | Issues, Concerns to Investigate |
|---|---|---------------------------------|
| <p>5.1 Monitoring reports from funders verify program compliance. Authority Citation of statutory and/or regulatory requirement that must be met. Significance Reports from funding sources provide board and staff with important feedback about program performance. <input type="checkbox"/> Warning Sign (Check if true) A pattern of monitoring reports indicating deficiencies or noncompliance in many programs, or repetition over time of such findings in individual programs, should signal board and management that systems problems need to be attended to.</p> | <p>Any monitoring reports from other funders on file at state office?</p> | |
| <p>5.2 Participant eligibility, cost allowability, service delivery, and program results have been satisfactorily documented for CSBG-funded activities. Authority Citation of statutory and/or regulatory requirement that must be met. Significance CSBG-funded activities carry the same compliance standards as other programs. Those standards are spelled out in grantee contracts. <input type="checkbox"/> Warning Sign (Check if true) Failure to comply with CSBG requirements could result in delayed, denied, or terminated funding, as well as decertification as a CSBG-eligible entity.</p> | <p>Monitoring reports</p> | |
| <p>5.3 Services are provided in cooperation and collaboration with other community organizations. Authority CSBG CAP Plan requirements.</p> | <p>Contracts, letters/ memoranda of understanding, or other documentation of collaboration on file?</p> | |

CAA Monitoring Desk Audit

Complete prior to conducting on-site monitoring

| Indicator | What I Should Look For | Issues, Concerns to Investigate |
|---|--|---------------------------------|
| <p>Significance CAAs are expected to "leverage" their resources by working with community partners.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Non-cooperating CAAs may be duplicating services or functions already existing at the expense of addressing another unmet need or condition.</p> | <p>Newspaper or other public media evidence of collaboration? letters, statements from partners?</p> | |
| <p>5.4 CAA staff participate in community service integration and coordination groups. Authority CSBG plan?</p> <p>Significance Staff participation in inter-agency coordination is a first step to higher levels of collaboration.</p> <p><input type="checkbox"/> Warning Sign (Check if true) A CAA that does not participate in inter-agency groups puts the CAA in isolation in the social services community, limiting its capacity to influence community programs and policies.</p> | <p>Evidence of such participation in annual CSBG application, work plan(s)?</p> | |

Summary

Do you regard this as a CAA at programmatic risk? Justify.

What corrective actions must the CAA take to stabilize its programmatic management or condition? Describe the resulting condition(s) and what evidence you will accept as proof such condition(s) have been achieved

What program services practices do you recommend that the CAA strengthen? List.

CAA Monitoring Desk Audit

Complete prior to conducting on-site monitoring

Administration

| Indicator | What I Should Look For | Issues, Concerns to Investigate |
|---|--|---------------------------------|
| <p>6.1 Information is rapidly and efficiently communicated throughout the organization. Authority ???.</p> <p>Significance Timely sharing of information maintains employee morale and ensures current awareness of compliance requirements. Two-way communication provides line and program staff with access to CAA leadership.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Employees unaware of current program information may incur disallowable costs or act out of compliance. Employees who feel uninformed and isolated become mistrustful and disgruntled, attitudes and feelings they may communicate to people served and to the community. A CAA that does not communicate its mission and activities to its partners and to the community limits its public good will and forfeits opportunities for community support.</p> | | |
| <p>6.2 The organization has an information technology infrastructure that supports timely and efficient communication, data collection, data analysis, and reporting.</p> <p>Authority GOEO CSBG Manual.</p> <p>Significance Electronic network communication increases contact between employees, facilitates collecting, archiving, and tabulating of participant and program information, and reduces the cost of distributing and sharing information. The GOEO has implemented a comprehensive information management system in which all CSBG grantees are required to participate.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Poorly implemented or supported electronic information technology can decrease employee</p> | <p>Written computer security policies and procedures for financial, client, and administrative data?</p> <p>Documentation of WVFACS information system implementation?</p> | |

CAA Monitoring Desk Audit

Complete prior to conducting on-site monitoring

| Indicator | What I should Look For | Issues, Concerns to Investigate |
|--|---|--|
| <p>productivity and increase employee dissatisfaction. Employees may be highly challenged by computer technology unless assisted with accessible, adequate technical support.</p> <p>6.3 The organization has instituted organization-wide service integration. Authority GOEO CSBG Manual. OCS Information Memorandum #49. CSBG PL 205-185</p> <p>Significance CAAs should reduce administrative and functional duplication in order to apply the greatest amount of resources to services. Assistance to low-income people should be provided in the context of their entire living situation.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Resources to assist low-income people and communities are wasted if used to support independent program "silos," duplicated administrative services, multiple staff interacting with families.</p> <p>6.4 The organization has no pending legal action. Authority GOEO CSBG Manual.</p> <p>Significance Legal actions may drain CAA reserves of unrestricted funds. They occupy the time and attention of administrators.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Legal actions indicate that the CAA has not conducted its activities consistently with its policies and procedures or with laws and regulations. They also suggest that the CAA lacks adequate internal controls to identify and correct improper or inappropriate activities. Successful legal actions may impose monetary obligations the CAA can not meet.</p> | <p>Annual CSBG plan/application/ budget</p> | |
| | <p>Examine current and previous years' budgets for legal expenses. Determine the reasons.</p> | |

CAA Monitoring Desk Audit

Complete prior to conducting on-site monitoring

Summary

Do you regard this as a CAA at administrative risk? Justify.

What corrective actions must the CAA take to stabilize its administrative management or condition? Describe the resulting condition(s) and what evidence you will accept as proof such condition(s) have been achieved

What administrative practices do you recommend that the CAA strengthen? List.

CAA _____ Date _____ Monitor _____

CAA Board of Directors Monitoring

Governance

| Indicator | What I Should Look For | Evidence from Documents, Interviews, Observations |
|--|--|---|
| <p>1.1 Board members were elected in accordance with grantee bylaws, CSBG legislation and regulations. Authority Public Law 105-285, 676B(a); Information Memorandum #82. Significance CSBG requires board have a tripartite structure and provide for democratic election of low income representatives. <input type="checkbox"/> Warning Sign (Check if true) Failure to comply with these requirements would be grounds of findings of non-compliance and possible decertification.</p> | <p>Please describe for me</p> <ul style="list-style-type: none"> • the tripartite board structure • democratic selection methods for low income members • methods recruiting elected officials or their representatives • methods for recruiting private sector members <p>Tell me how you were recruited/selected/seated</p> <p>If you represent an organization, did your organization have to provide some kind of evidence of how you were selected?</p> | |
| <p>1.2 All board meetings in the past 12 months were conducted after determining a quorum. Authority State nonprofit corporation law requirements on minimum number of board members and requirements for establishing a quorum. Significance Conducting organizational business in the absence of a quorum renders such decisions invalid. <input type="checkbox"/> Warning Sign (Check if true) See Significance.</p> | <p>How does the board determine and document a quorum? How often has the board not had a quorum in the past 12 months?</p> | |
| <p>1.3 Minutes clearly document board discussions and decisions.</p> | <p>Do you have difficulty restating or understanding motions during their</p> | |

CAA Board of Directors Monitoring

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|--|---|--|
| <p>Authority State nonprofit corporation law.</p> <p>Significance Minutes constitute the official, legal record of the acts of the corporation.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Ambiguous or incomplete information in minutes prevents members and other parties from understanding the actions and decisions of the board.</p> <p>1.4 The board had more than 70% membership participation in the past twelve months.</p> <p>Significance Vacant seats or nonparticipating members limit the representativeness of a board.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Low participation may result in official decisions being made by a minority of board members.</p> | <p>discussion?</p> <p>Do you have difficulty understanding motions after they have been published in minutes?</p> <p>Do your minutes capture an accurate, but not too detailed, description of the discussions held at meetings?</p> <p>Compute this ratio: Sum of attendees at meetings in last 12 months</p> <hr/> <p># of board seats * number of meetings in last 12 months</p> <p>Do you know the participation rate for board members? (If not, give them the ratio above.)</p> <p>Why do members miss meetings? Why do positions remain vacant?</p> <p>What steps has the board taken to reduce absenteeism and vacancy?</p> | |
| <p>1.5 The board is knowledgeable about the statutory and regulatory requirements of its work.</p> <p>Authority OCS Information Memorandum #82</p> <p>Significance Board members must understand its obligations to "play by the rules" contained in legislation, OMB Financial Management circulars, grants, contracts, etc.</p> | <p>Please tell me about the laws and regulations the board must ensure are being followed by your CAA.</p> <p>Determine whether members are able to identify:</p> <ul style="list-style-type: none"> - CSBG law - State nonprofit corporation law - OMB financial management circulars | |

CAA Board of Directors Monitoring

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|--|--|---|
| <p><input type="checkbox"/> Warning Sign (Check if true) Failure to comply with these requirements can lead to audit findings, monitoring findings, disallowed costs, and possible loss of funding.</p> | <ul style="list-style-type: none"> - Wage and hour law, IRS and other employment regulations - Unemployment and workers compensation laws | |
| <p>1.6 The board maintains current organizational documents. Authority OCS Information Memorandum #82 Significance The board must understand its obligations to be current in its organizational documents. <input type="checkbox"/> Warning Sign (Check if true) Failure to comply with these requirements can lead to ineligibility for funding, legal liabilities, lack of clarity about the organization's mission.</p> | <p>Has your CAA changed its articles of incorporation recently? (When? Why?) Has the board reviewed and/or revised its bylaws recently? Do board members sign a conflict of interest declaration? How often? Do board member sign a code of ethics?</p> | |
| <p>1.7 Board members are knowledgeable about board structure and functioning. Authority OCS Information Memorandum #82 Significance The board should be well informed about how the board is organized. <input type="checkbox"/> Warning Sign (Check if true) Lack of clarity and understanding of the bylaws can lead to improper or illegal actions by the board.</p> | <p>What are the board officer positions? What are the board's standing committees, as defined in the bylaws? Which committees actively meet and report to the board? Does the board have a committee responsible for maintaining the membership and coordinating training of members?</p> | |
| <p>1.8 The board leads organizational mission definition, long- and short-range planning. Authority OCS Information Memorandum</p> | <p>Have you participated in a board reconsideration of your CAA's values and mission statement? When was that? Have you participated in your CAA's</p> | |

CAA Board of Directors Monitoring

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|--|--|---|
| <p>#82</p> <p>Significance The board is responsible to set, protect, and advance the organization's strategic direction.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Failure to set, protect, and advance the organization's strategic direction may result in a lack of focus and purpose in the organization, leading to involvement in unsustainable activities.</p> | <p>community assessment? When? What did you do?</p> <p>Have you participated in developing your CAA's current strategic plan? When? What did you do?</p> <p>Has your CAA found itself involved in programs or activities that it couldn't maintain?</p> <p>Do you think your CAA has programs or activities that didn't seem to "fit" its mission? Has the board discussed that?</p> | |
| <p>1.9 The board carries out its responsibility to approve and oversee the organization's administrative and financial management policies and procedures.</p> <p>Authority OCS Information Memorandum #82</p> <p>Significance The board needs to be clear about its responsibilities to set agency policies and to verify their implementation.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Failure to adopt and follow policies and procedures can expose the organization to audit and monitoring findings, as well as possible legal liabilities.</p> | <p>Has the board recently reviewed and/or revised your CAA's financial policies and procedures?</p> <p>Has your CAA obtained outside expert advice on revising its financial policies and procedures? Who? When?</p> <p>What did the last annual agencywide audit report say about your CAA's financial management practices?</p> <p>Have any recent program monitoring reports raised any concerns about your CAA's financial management practices?</p> | |
| <p>1.10 The board carries out its responsibility to approve and oversee the</p> | <p>Has the board recently reviewed and/or revised your CAA's personnel policies</p> | |

CAA Board of Directors Monitoring

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|--|--|---|
| <p>organization's personnel/human resources policies and procedures. Authority OCS Information Memorandum #82</p> <p>Significance The board needs to be clear about its responsibilities to set agency policies and to verify their implementation.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Failure to adopt and follow policies and procedures can expose the organization to audit and monitoring findings, as well as possible legal liabilities.</p> | <p>and procedures?</p> <p>Has your CAA obtained outside expert advice on revising its personnel policies and procedures? Who? When?</p> <p>Have any recent program monitoring reports raised any concerns about your CAA's personnel management practices? Which program? What concerns?</p> | |
| <p>1.11 The board conducts systematic oversight of its programs and services. Authority OCS Information Memorandum #82</p> <p>Significance The board is responsible for ensuring that all programs and services are operated in compliance.</p> <p><input type="checkbox"/> Warning Sign (Check if true) The board has final legal responsibility for all actions of the organization.</p> | <p>Does the board vote to accept all grants and contracts, including their budgets?</p> <p>Does the board receive all funder reports on monitoring of CAA programs?</p> <p>Does the board have specific procedures to evaluate your CAA's programs on a regular basis?</p> <p>Does the staff provide—without being asked—action plans to correct any areas of noncompliance or deficiency identified in funder monitoring?</p> | |
| <p>1.12 The board carries out its responsibilities for employing, leading, and evaluating the executive director. Authority OCS Information Memorandum #82</p> <p>Significance The board needs to be clear</p> | <p>Does the executive director have a contract?</p> <p>If not, is the executive director included on your CAA's wage schedule?</p> <p>Describe the goals and objectives the board has established for the executive</p> | |

CAA Board of Directors Monitoring

| Indicator | What I Should Look For | Evidence from Documents, Interviews, Observations |
|--|---|--|
| <p>about its responsibilities toward the executive. The executive director needs to be confident that performance expectations have been clearly defined and communicated.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Lack of clarity and understanding of the board's role can lead to executive dominance of the board and/or divergence from the CAA's mission and strategic plan.</p> | <p>director for the current fiscal year and how they were arrived at.</p> <p>Are those goals and objectives in a written document?</p> <p>Does the executive director and each board member have a copy of that document?</p> <p>Does the board use a formal, written process to evaluate the executive director?</p> <p>How many board members participate in evaluation of the executive director? Describe that participation.</p> | |

Do you regard this CAA as at risk in governance? Justify.

What corrective actions must the CAA take to normalize its governance? Describe the resulting condition and what evidence you will accept of proof that condition has been achieved?

List any governance practices you recommend that the CAA strengthen.

CAA Board of Directors Monitoring

Financial Management and Condition

| Indicator | What I Should Look For | Evidence from Documents, Interviews, Observations |
|--|---|---|
| <p>2.2 Grantee uses a single set of financial management policies and procedures. Authority Citation of statutory and/or regulatory requirement that must be met. Significance This is an OMB Circular requirement. Programs may have additional or more stringent requirements but should never be excepted from general policies or procedures. <input type="checkbox"/> Warning Sign (Check if true) An agency without written, board-approved financial management policies and procedures—that they actually follow—cannot claim to have adequate internal controls. Procedures that are not uniformly applied cannot be said to be adequately implemented. This will lead to adverse audit reports.</p> | <p>Does your CAA have different financial policies and procedures for any of your programs? Are those differences required by a contract or some program guidelines? Have all versions been approved by your board? How does the board ensure that your financial policies and procedures comply with the most current rules and regulations? How does the board determine whether important financial transactions like use of purchase orders or bidding for major purchases are being handled consistently with the policies and procedures the board has approved? How do you ensure that major financial management functions must be handled, reviewed, or approved by more than one person?</p> | |
| <p>2.3 The board approves all organizational obligations. Authority Citation of statutory and/or regulatory requirement that must be met. Significance The board holds ultimate legal</p> | <p>Do board members understand their legal responsibility for obligations of your CAA? Has the board defined some actions</p> | |

CAA Board of Directors Monitoring

| Indicator | What I Should Look For | Evidence from Documents, Interviews, Observations |
|---|--|--|
| <p>responsibility for the organization. Any agreement that creates a liability for the grantee needs to be approved by the board.</p> <p><input type="checkbox"/> Warning Sign (Check if true) The board needs to be aware of significant commitments made to other parties. The viability or existence of the organization could be threatened if it is unable to meet its obligations.</p> | <p>that only it can approve? Are those limits spelled out in your bylaws? Financial policies and procedures? executive director's contract or job description? Other policy guidance? Describe the organizational obligations (funds applications, grants, contracts, loans, mortgages, fringe benefits, pay schedule, budgets, etc.) that must be submitted to the board for review and approval.</p> <p>Is board approval of legal obligations adequately documented in board minutes?</p> | |
| <p>2.4 The board and program directors receive timely and accurate monthly financial statements.</p> <p>Authority Citation of statutory and/or regulatory requirement that must be met.</p> <p>Significance Up-to-date financial information is essential to understanding the current and future well-being of the organization.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Inaccurate and/or out of date financial information could lead to over- or under-spending of budgets, leading to possible findings of deficiency, noncompliance, funding reduction, or defunding, leaving the organization with obligations it might have to meet from unrestricted funds.</p> | <p>Does each program/account have a current, board-approved budget?</p> <p>Has the board approved a master budget for your CAA?</p> <p>What financial documents are routinely distributed to the board and accepted by it?</p> <p>Describe how those documents are explained to the board.</p> <p>Is financial statements report information less than 30 days old? Does it contain actual to budget, program to date comparisons?</p> | |

CAA Board of Directors Monitoring

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|--|---|---|
| <p>2.5 The board receives a reconciled Balance Sheet twice a year.</p> <p>Authority Citation of statutory and/or regulatory requirement that must be met.</p> <p>Significance This document depicts the overall well-being of the organization, not just of individual accounts. It is a primary tool for boards to identify changes in the global viability of the organization. An effective finance director should be able to produce a balance sheet at any time and explain and justify every number on it.</p> <p><input type="checkbox"/> Warning Sign (Check if true) A negative assets to liabilities ratio means the organization could not clear all its debts by liquidating all its assets. Rapid changes (particularly toward declining or negative asset to debt ratios) signal possible loss of financial control and increasing vulnerability or crisis.</p> | <p>Are the financial statements presented to the board directly generated from your accounting software? Is the information the board receives supported by such documents?</p> <p>Do you have a clear understanding of your CAA's financial well-being from the information you receive?</p> <p>Do you receive the right kind of financial information for you to tell if your CAA could be getting in trouble financially?</p> <p>Can you explain the difference between a financial statement and a balance sheet?</p> <p>When was the last time the board had your CAA's balance sheet explained to it?</p> <p>Is your CAA worth more than it owes, should it have to close? By how much?</p> <p>Do you know whether that number has changed in the last one to three years? By how much? In which direction?</p> | |

CAA Board of Directors Monitoring

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|--|---|---|
| <p>2.6 Administrative expenses are distributed on the basis of a board-approved cost allocation plan or an approved indirect cost rate.</p> <p>Authority This is an OMB circulars requirement.</p> <p>Significance A consistent set of criteria or justifications must be used to assign administrative costs to funding sources.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Failure to have and follow an approved cost allocation plan can lead to adverse audits, program monitoring findings of deficiency or noncompliance, reduction or denial of funding, or requirement to repay questioned costs from unrestricted funds.</p> | <p>Explain your CAA's method of assigning administrative costs: indirect cost rate? or cost allocation plan?</p> <p>What information did you receive from your staff to justify or support this plan and rate?</p> <p>Did your auditor review and approve your plan? Did your funders?</p> <p>Did the board approve this plan or rate?</p> | |
| <p>2.7 Approved purchasing policies and procedures are consistently followed.</p> <p>Authority This is an OMB circular requirement.</p> <p>Significance Adherence to written, approved purchasing procedures provide internal control in an area of financial management easy to abuse.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Failure to have and follow an approved purchasing policies and procedures can lead to adverse audits, program monitoring findings of deficiency or noncompliance, reduction or denial of funding, or requirement to repay questioned costs from unrestricted funds.</p> | <p>Does your CAA have written purchasing policies and procedures? Can you briefly describe them?</p> <p>When were they last reviewed by the board?</p> <p>Have they been approved by the board?</p> | |
| <p>2.8 Reports to funders are submitted accurately and on time.</p> <p>Authority This is a requirement of grants and</p> | <p>Are program and financial reports consistently filed by required reporting deadlines?</p> | |

CAA Board of Directors Monitoring

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|--|--|---|
| <p>contracts, as well as OMB circulars.</p> <p>Significance Reports on progress toward program goals and on spending compared with budgets are a major tool for staff, the board, and funders to regularly assess grantee performance.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Failure to file accurate and timely reports can lead to adverse audits, program monitoring findings of deficiency or noncompliance, reduction or denial of funding, or requirement to repay questioned costs from unrestricted funds. It is also evidence of lack of management control.</p> | <p>Does the board approve these reports before they are sent in?</p> <p>Does your CAA have problems producing timely, accurate reports? Describe.</p> <p>Do you know whether funders have returned any reports for completion or correction.</p> <p>What action has your CAA taken to eliminate timely, accurate reporting problems?</p> | |
| <p>2.9 Findings, disallowed costs, qualified opinions, and management advisories cited in audit reports and management letters are promptly corrected.</p> <p>Authority An OMB circular requirement. May also appear in grant and contracts conditions.</p> <p>Significance An audit provides the board with an independent, "outside" and professional opinion on the likely accuracy and trustworthiness of the grantee's financial operations. Auditors can focus the board's attention on internal controls that need strengthening.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Failure to correct such conditions is evidence of lack of management control and can lead to adverse audits, program monitoring findings of deficiency or noncompliance, reduction or denial of funding, or requirement to repay questioned costs.</p> | <p>How seriously do you, as a board member, take concerns or issues raised in your annual audit report?</p> <p>Have any financial management concerns been cited in the last three audits?</p> <p>Were any such concerns presented to the board by the auditor?</p> <p>Have any of these concerns come up more than one year?</p> <p>Did the board direct staff to carry out corrective action? Was that corrective action reported to and accepted by the board?</p> <p>Were any employees disciplined because these concerns were raised or because they were not fixed?</p> | |

CAA Board of Directors Monitoring

| Indicator | What I Should Look For | Evidence from Documents, Interviews, Observations |
|---|---|--|
| <p>2.10 Property and equipment inventories are less than two years old.</p> <p>Authority This is an OMB circular requirement. It may also be a grant/contract condition.</p> <p>Significance Such records are important to document insurance or damage claims, as well as acquisition or disposition and possible "ownership interest" in contract purchased property.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Failure to maintain compliant, timely inventory records can lead to adverse audits, program monitoring findings of deficiency or noncompliance, reduction or denial of funding, or requirement to repay questioned costs from unrestricted funds. It is also evidence of lack of management control.</p> | <p>What items does your CAA keep inventories of?</p> <p>Does your CAA keep more than one kind of inventory? Explain.</p> <p>Are your inventories kept up to date?</p> <p>Does your CAA follow standard procedures for adding items to the inventory or taking items off of it?</p> | |
| <p>2.11 There are no unfunded liabilities.</p> <p>Authority Citation of statutory and/or regulatory requirement that must be met.</p> <p>Significance Such unfunded obligations may shift the asset to liabilities ratio to negative.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Having to meet these obligations may place great strain on the agency's cash management and cash reserves. This may result in spending of grant funds for non-allowable purposes, or necessitate obtaining or increasing a line of credit.</p> | <p>Are you aware of any obligations your CAA owes to its employees or its creditors that have not been budgeted for? Examples might include:</p> <ul style="list-style-type: none"> - Bills or other debts that are not being paid - Employees' accrued annual leave - Taxes owed that have not been paid on time - Large, long-term mortgages or loans | |
| <p>2.12 Funders have disallowed costs.</p> <p>Authority Grant awards or contracts.</p> | <p>Have any of your funding sources told your CAA that some expenses</p> | |

CAA Board of Directors Monitoring

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|--|--|---|
| <p>Significance Disallowed costs can not be paid from grant/contract funds or be reimbursed to the funder from unrestricted funds.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Having to meet these obligations may place great strain on the agency's cash management and cash reserves. This may result in spending of grant funds for non-allowable purposes, or necessitate obtaining or increasing a line of credit.</p> <p>2.13 Bills and expenses are paid within 30 days of receipt or due date.</p> <p>Authority Citation of statutory and/or regulatory requirement that must be met.</p> <p>Significance Timely payment indicates good cash management and provides documentation for prompt reimbursement claims filing.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Inability to pay obligations timely may indicate cash flow and balance sheet problem—evidence of over-expenditure, non-allowable spending, or use of funds from one program to pay expenses of another.</p> | <p>will not be reimbursed? When? What program(s)? What action did the staff and board take to resolve the situation(s)?</p> <p>Do you know what percentage of your CAA's bills are paid in less than 30 days? Less than 90 days?</p> | |

Summary

Do you regard this as a CAA at financial risk? Justify.

What corrective actions must the CAA take to stabilize its financial management or condition? Describe the resulting condition(s) and what evidence you will accept of proof that such condition(s) has been achieved?

CAA Board of Directors Monitoring

What financial management practices do you recommend that the CAA strengthen? List.

Human Resources

| Indicator | What I Should Look For | Evidence from Documents, Interviews, Observations |
|---|---|---|
| <p>3.1 Grantee complies with all state and federal regulations contained in the state CSBG plan.</p> <p>Authority These are based in federal and state legislation and regulation.</p> <p>Significance Observing these regulations is a requirement for funding.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Failure to meet these requirements can lead to adverse audits, program monitoring findings of deficiency or noncompliance, delayed, reduced or denied funding, or requirement to repay questioned costs from unrestricted funds. It is also evidence of lack of management control.</p> | <p>Are you aware of the compliance assurances that your CAA must give as part of its CSBG funding plan/application?</p> <p>Do you believe that your CAA has complied with all of its legal and regulatory responsibilities?</p> <p>What is the basis for your answer?</p> | |
| <p>3.2 The grantee has a board-approved set of employment policies and procedures.</p> <p>Authority text</p> <p>Significance The terms and conditions of employment must be formally established and approved by the board so that all employees can be treated consistently.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Inconsistency in the treatment of employees can open the grantee up to grievances and law suits that could undermine its credibility and viability.</p> | <p>When were your employment policies and procedures most recently approved by the board?</p> <p>Was board approval recorded in the minutes?</p> <p>Have all employees have received training in the employment policies and procedures (signed document in their personnel file).</p> <p>Does each employee have a copy of</p> | |

CAA Board of Directors Monitoring

| Indicator | What I Should Look For | Evidence from Documents, Interviews, Observations |
|---|--|---|
| <p>3.3 The employment policies and procedures include a hiring process that is consistently used and documented.</p> <p>Authority text</p> <p>Significance Adherence to written, board-approved hiring processes protects the grantee against accusations of abuse or favoritism in employment.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Inconsistent employment practices are demoralizing to staff and employment-related legal actions can be costly and divert staff time and energy from delivery of quality services.</p> | <p>the employee manual?</p> <p>Have any employment grievances or complaints arisen from misunderstanding of the personnel policies and procedures?</p> <p>Are approved hiring, disciplinary, and termination policies and procedures followed throughout the organization?</p> <p>Are hiring and firing functions performed by an HR employee to ensure consistency throughout the organization?</p> <p>Has the board been informed of any/all employment-related legal actions?</p> <p>Has the CAA resolved all employment grievances or legal actions?</p> | |
| <p>3.4 All positions have been properly classified as to their salaried or non-salaried status.</p> <p>Authority The IRS (?? Department of Labor??) has strict regulations about the criteria that determine salaried or non-salaried status.</p> <p>Significance This classification affects what kinds of responsibilities can be assigned to employees, the amount of supervision they receive or exercise, and whether they must be</p> | <p>Have your positions been classified as salaried or non-salaried? Is the classification contained on each job description?</p> <p>IF NO...Are you aware of the legal importance of classifying jobs as salaried or non-salaried? Explain.</p> <p>Was the classification determination made or reviewed by a qualified HR</p> | |

CAA Board of Directors Monitoring

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|--|--|---|
| <p>paid overtime.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Significant financial penalties can result from improper job classification, including grantee obligation to pay back wages (particularly overtime), benefits, and related fines, paid out of unrestricted funds.</p> | <p>professional?</p> <p>Do your job postings and advertisements specify whether positions advertised are salaried or non-salaried?</p> | |
| <p>3.5 The board has approved a pay schedule, based on a current wage comparability study.</p> <p>Authority This is an OMB circular requirement.</p> <p>Significance Pay equity should be based on objective data and a well-defined matrix of job classifications and pay ranges. Such a plan provides the rationale for what employees are paid.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Pay decisions not supported by the pay schedule can result in grievances, complaints, legal actions, and financial obligations to the grantee that must be paid out of unrestricted funds.</p> | <p>When was the most recent wage comparability study conducted by or for your CAA?</p> <p>Was the study performed by a qualified human resources professional?</p> <p>Did you create, and did your board approve, a pay schedule based on information from your wage comparability study?</p> <p>Do you have more than one pay schedule or plan (employee plan; union contract; executive director contract)?</p> <p>Are there significant different between these plans? Have the differences affected employee morale?</p> | |
| <p>3.6 The grantee has a board-approved fringe benefits plan.</p> <p>Authority text</p> <p>Significance Fringe benefits are important incentives to recruiting and retaining employees.</p> | <p>Do you have more than one fringe benefits package or plan (employee plan; union contract; executive director contract)?</p> <p>Are there significant different</p> | |

CAA Board of Directors Monitoring

| Indicator | What I Should Look For | Evidence from Documents, Interviews, Observations |
|---|--|--|
| <p>Fringe benefits must be offered equally to all employees. Employees under contract (e.g. executive director, those under a union contract) can be offered different benefits.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Failure to maintain fringe benefits (pay for them), or to provide them unequally, could create legal and financial liabilities for the grantee.</p> | <p>between these plans? Have the differences affected employee morale?</p> <p>Has your board approved all benefit plans (minutes)? When was the benefits package last approved by the board</p> <p>Have you had any fringe-related grievances, complaints, or legal actions?</p> | |
| <p>3.7 Employee performance evaluations are conducted regularly and consistently.</p> <p>Authority text</p> <p>Significance Performance evaluations provide the basis for disciplinary, promotion, reduction in force, and termination decisions. They are an important source of feedback to employees.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Personnel actions unsupported by a history of performance evaluation could be contested by employees, generating legal and financial obligations to the grantee that would have to be paid out of unrestricted funds.</p> | <p>How often is employee performance evaluated?</p> <p>How is the evaluation done? (interview, evaluation form)</p> <p>Is the same evaluation process and document used for all employees? If not, explain the differences.</p> <p>What are the disciplinary procedures in your CAA?</p> <p>What are the grievance procedures in your CAA?</p> <p>If you have had a recent contested evaluation or a disciplinary action, describe how that was handled.</p> | |
| <p>3.8 The grantee benefits from stable management leadership.</p> <p>Authority text</p> <p>Significance Stability in management leadership</p> | <p>Has your CAA experienced significant turnover in recent years?</p> <p>What has been the effect on programs or on the organization as a whole?</p> | |

CAA Board of Directors Monitoring

| Indicator | What I Should Look For | Evidence from Documents, Interviews, Observations |
|---|--|--|
| <p>positions tends toward continuity in grantee operation.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Changes in management leadership shift leadership attention and energy from program improvement and strategic thinking to training and assimilation of new managers. Frequent changes in leadership (more than one per year or frequent changes in one position) disrupt program management and undermine morale.</p> | <p>What steps have been taken to identify and address high turnover?</p> | |
| <p>3.9 The grantee has program and/or individual staff development/training plans.</p> <p>Authority A CSBG contractual requirement???</p> <p>Significance Regular, planned training builds employee competencies and improves program performance. Regular training indicates the grantee values employees and has a commitment to high program performance.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Failure to train employees or to upgrade their job skills indicates organizational indifference to employees and limited commitment to service excellence. Low employee and program performance can lead to adverse monitoring results, up to loss of funding and obligations to repay funders.</p> | <p>Do your personnel policies provide for individual development or team training?</p> <p>Do employees develop and carry out individual development plans?</p> <p>How do you document education or training provided to, or received by, employees?</p> <p>Do employees provide any feedback on the value of training or education they have received?</p> | |

Summary

Do you regard this as a CAA at risk in its human resources practices? Justify.

CAA _____ Date _____ Monitor _____

CAA Board of Directors Monitoring

What corrective actions must the CAA take to normalize/legalize its human resources practices? Describe the resulting condition and what evidence you will accept of proof of achievement of that condition?

What human resources practices do you recommend that the CAA strengthen? List.

Planning

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|---|--|---|
| <p>4.1 Grantee has completed a community assessment within the past three years. Authority A state CSBG requirement (citation) Significance A CAA must understand its community and the populations it serves in order to be responsive to them. It must also understand the resources and network of social service providers in order to assess its most effective role(s) in that network.</p> <p><input type="checkbox"/> Warning Sign (Check if true) CAAs that do not understand their community will likely be perceived as "outsiders," as duplicating services, as unresponsive to the community. Lack of community understanding will limit the CAA's capacity to leverage resources and to focus its efforts where they can have the greatest benefit.</p> | <p>Describe the most recent community assessment prepared by your CAA.</p> <p>What was your opinion of the quality and usefulness of the community assessment?</p> <p>Was the current community assessment presented to committees and the board?</p> <p>How was the community assessment used in development of strategic, CSBG, and program plans?</p> | |
| <p>4.2 The grantee is guided by a strategic plan completed within the last five years. Authority A state CSBG requirement (citation) Significance The approval and use of a strategic plan indicates an organization aware of its</p> | <p>Describe the most recent strategic plan prepared by your CAA.</p> <p>Was information collected on enough topics to produce a comprehensive picture of the communities your</p> | |

CAA Board of Directors Monitoring

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|--|--|---|
| <p>priorities and possessing a sense of direction. Strategic plans define the conversation board and staff leadership should be having.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Lack of, or failure to use, a strategic plan indicates the grantee lacks a sense of priorities and is operating reactively and passively. It indicates indifference to the conditions in its community and the needs of the populations it serves.</p> | <p>CAA serves?</p> <p>How useful was the information collected for your CAA's planning process?</p> <p>Was the information analyzed and discussed by a good cross section of staff, board, and community partners?</p> <p>Was the community assessment presented to the board?</p> <p>Was the community assessment information valuable to the development of the current strategic plan?</p> <p>Was the current strategic plan presented to committees and the board?</p> <p>Describe how the strategic plan was used in development of CSBG and other program plans.</p> | |
| <p>4.3 The grantee has implemented state-defined ROMA practices.</p> <p>Authority PL 105-385, 676(b)(II)(D)(12), State CSBG plan and CAA contracts.</p> <p>Significance The Community Services Block grant requires that states and grantees participate in ROMA or some other performance measurement system. Use of a performance measurement</p> | <p>Has your board been trained on the ROMA outcomes management framework?</p> <p>How have you incorporated ROMA concepts into CAA planning and management activities?</p> <p>Has the board of directors incorporated ROMA concepts into</p> | |

CAA Board of Directors Monitoring

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|---|--|---|
| <p>system also indicates a CAA's commitment to achievement and documentation of the changes it is able to bring about for families and communities.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Failure to participate in ROMA or other measurement system could lead to adverse monitoring reports and possible delay, denial, and termination of funding.</p> <p>4.4 Grantee reports progress on its plans to its board of directors at least semi-annually.</p> <p>Authority text</p> <p>Significance The board of directors can not make informed decisions without accurate and current information about program performance. Reports on that performance need to be frequent and understandable.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Lack of current, accurate program information may lead management and the board to make decisions or commitments they can't follow through on.</p> | <p>its planning and monitoring activities?</p> <p>Describe your adoption of the WVFACS data collection system.</p> <p>What program progress reports are presented to committees and the board, in what form, and with what frequency?</p> <p>Has information presented in program progress reports increased board members' understanding of program compliance and positive outcomes for participants?</p> <p>Has the board had to reverse decisions or undo commitments because they received information too late?</p> | |

Summary

Do you regard this as a CAA as at-risk in implementation of its planning? Justify.

What corrective actions must the CAA take to stabilize its planning practices? Describe the resulting condition(s) and what evidence you will accept as proof such condition(s) have been achieved?

CAA Board of Directors Monitoring

What planning practices do you recommend that the CAA strengthen? List.

Services

| Indicator | What I Should Look For | Evidence from Documents, Interviews, Observations |
|--|--|---|
| <p>5.1 Monitoring reports from funders verify program compliance. Authority Citation of statutory and/or regulatory requirement that must be met. Significance Reports from funding sources provide board and staff with important feedback about program performance. <input type="checkbox"/> Warning Sign (Check if true) A pattern of monitoring reports indicating deficiencies or noncompliance in many programs, or repetition over time of such findings in individual programs, should signal board and management that systems problems need to be attended to.</p> | <p>What program monitoring reports has your CAA received since the last CSBG monitoring (DATE)? Have those reports suggested organizational or program patterns of deficiency and noncompliance? Describe. Have these monitoring reports been presented to the board of directors? What actions have been taken to resolve the problems identified by monitoring?</p> | |
| <p>5.2 Participant eligibility, cost allowability, service delivery, and program results have been satisfactorily documented for CSBG-funded activities. Authority Citation of statutory and/or regulatory requirement that must be met. Significance CSBG-funded activities carry the same compliance standards as other programs. Those standards are spelled out in grantee contracts. <input type="checkbox"/> Warning Sign (Check if true) Failure to comply with CSBG requirements could result in delayed, denied, or terminated funding, as well as</p> | <p>What steps do you take internally to verify that programs comply with requirements related to: - participant eligibility? - Allowable costs? - Allowable activities? - Program outcomes and results?</p> | |

CAA Board of Directors Monitoring

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|--|---|---|
| <p>decertification as a CSBG-eligible entity.</p> <p>5.3 Services are provided in cooperation and collaboration with other community organizations. Authority CSBG CAP Plan required to "leverage" their resources by working with community partners. <input type="checkbox"/> Warning Sign (Check if true) Non-cooperating CAAs may be duplicating services or functions already existing at the expense of addressing another unmet need or condition.</p> | <p>Describe the partnerships your CAA has with other organizations and programs. How many of these partnerships revolve around co-funding of programs? Do you have contracts, letters/ memoranda of understanding, or other documents making those partnerships official? Do you have newspaper or other public media evidence of your collaboration? ask for letters, statements or partners.</p> | |
| <p>5.4 CAA staff participate in community service integration and coordination groups. Authority CSBG plan? Significance Staff participation in inter-agency coordination is a first step to higher levels of collaboration. <input type="checkbox"/> Warning Sign (Check if true) A CAA that does not participate in inter-agency groups puts the CAA in isolation in the social services community, limiting its capacity to influence community programs and policies.</p> | <p>Do program managers or other staff participate in inter-agency groups at the community, county, or state level? Are minutes or summaries of such meetings circulated to appropriate persons in your CAA? Have any of your CAA staff held leadership positions in inter-agency groups? Has there been any media</p> | |

CAA Board of Directors Monitoring

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|-----------|---|---|
| | coverage of the work or impact of these groups? | |

Summary

Do you regard this as a CAA at programmatic risk? Justify.

What corrective actions must the CAA take to stabilize its programmatic management or condition? Describe the resulting condition(s) and what evidence you will accept as proof such condition(s) have been achieved

What program services practices do you recommend that the CAA strengthen? List.

Administration

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|---|---|---|
| <p>6.1 Information is rapidly and efficiently communicated throughout the organization. Authority ???.</p> <p>Significance Timely sharing of information maintains employee morale and ensures current awareness of compliance requirements. Two-way communication provides line and program staff with access to CAA leadership.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Employees unaware of current program information may incur disallowable costs or act out of compliance. Employees who feel uninformed and isolated become mistrustful and disgruntled, attitudes and feelings</p> | <p>How is material distributed to board members?</p> <p>Does the CAA's top leadership meet at regular intervals?</p> <p>Do program and/or worksite teams meet at regular intervals?</p> <p>Do teams document their discussions and decisions in minutes or meeting summaries?</p> <p>Are minutes or meeting summaries communicated throughout the organization?</p> | |

CAA Board of Directors Monitoring

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|--|---|---|
| <p>they may communicate to people served and to the community. A CAA that does not communicate its mission and activities to its partners and to the community limits its public good will and forfeits opportunities for community support.</p> <p>6.2 The organization has an information technology infrastructure that supports timely and efficient communication, data collection, data analysis, and reporting.</p> <p>Authority GOEO CSBG Manual.</p> <p>Significance Electronic network communication increases contact between employees, facilitates collecting, archiving, and tabulating of participant and program information, and reduces the cost of distributing and sharing information. The GOEO has implemented a comprehensive information management system in which all CSBG grantees are required to participate.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Poorly implemented or supported electronic information technology can decrease employee productivity and increase employee dissatisfaction. Employees may be highly challenged by computer technology unless assisted with accessible, adequate technical support.</p> | <p>Does the CAA have an internal newsletter or other mechanism for sharing information with all employees?</p> <p>What methods and mechanisms does the CAA use to tell its story to the community?</p> <p>Does the CAA operate one or more computer networks?</p> <p>Are all central office staff networked?</p> <p>Are all satellite offices networked to the central office? In real time?</p> <p>On a dial-up or Internet access basis?</p> <p>Does the CAA have written computer security policies and procedures for financial, client, and administrative data?</p> <p>Does the CAA have and carry out a system of regular data back-up and off site storage?</p> <p>Does the CAA have an on-site system administrator? If not, who provides that service?</p> <p>Does the CAA have a tech support specialist on staff?</p> <p>Has the CAA completely</p> | |

CAA Board of Directors Monitoring

| Indicator | What I Should Look For | Evidence from Documents, Interviews, Observations |
|---|---|---|
| <p>6.3 The organization has instituted organization-wide service integration. Authority GOEO CSBG Manual. OCS Information Memorandum #49. CSBG PL 205-185 Significance CAAs should reduce administrative and functional duplication in order to apply the greatest amount of resources to services. Assistance to low-income people should be provided in the context of their entire living situation.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Resources to assist low-income people and communities are wasted if used to support independent program "silos," duplicated administrative services, multiple staff interacting with families.</p> | <p>implemented the WVFACS information system?</p> <p>What mechanisms does the CAA use to bring staff from all programs together to streamline services to low-income people?</p> <p>Do central administrative functions support many programs or activities or do programs have similar staff who perform the same functions?</p> <p>Does the CAA have policies and procedures to identify and resolve conflicts between programs or departments?</p> | |
| <p>6.4 The organization has no pending legal action. Authority GOEO CSBG Manual. Significance Legal actions may drain CAA reserves of unrestricted funds. They occupy the time and attention of administrators.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Legal actions indicate that the CAA has not conducted its activities consistently with its policies and procedures or with laws and regulations. They also suggest that the CAA lacks adequate internal controls to identify and correct improper or inappropriate activities. Successful legal actions may impose monetary</p> | <p>Obtain a list of unresolved</p> <ul style="list-style-type: none"> - employment grievances - complaints - lawsuits <p>Examine current and previous years' budgets for legal expenses. Determine the reasons. Determine whether there are patterns to grievances, complaints, or lawsuits that indicate systemic weaknesses.</p> | |

CAA Board of Directors Monitoring

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|-----------------------------------|-------------------------------|--|
| obligations the CAA can not meet. | | |

Summary

Do you regard this as a CAA at administrative risk? Justify.

What corrective actions must the CAA take to stabilize its administrative management or condition? Describe the resulting condition(s) and what evidence you will accept as proof such condition(s) have been achieved

What administrative practices do you recommend that the CAA strengthen? List.

Executive Director Questions

Governance

| Indicator | What I Should Look For | Evidence from Documents, Interviews, Observations |
|---|--|---|
| <p>1.1 Board members were elected in accordance with grantee bylaws, CSBG legislation and regulations. Authority Public Law 105-285, 676B(a); Information Memorandum #82. Significance CSBG requires board have a tripartite structure and provide for democratic election of low income representatives.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Failure to comply with these requirements would be grounds of findings of non-compliance and possible decertification.</p> | <p>Describe the</p> <ul style="list-style-type: none"> • democratic selection methods for low income members • methods for soliciting and seating elected officials or their representatives • methods for recruiting public sector members <p>How are the board member recruitment and selection processes documented?</p> | |
| <p>1.2 All board meetings in the past 12 months were conducted after determining a quorum. Authority State nonprofit corporation law requirements on minimum number of board members and requirements for establishing a quorum. Significance Conducting organizational business in the absence of a quorum renders such decisions invalid.</p> <p><input type="checkbox"/> Warning Sign (Check if true) See Significance.</p> | <p>How does the board determine and document a quorum?</p> | |
| <p>1.3 Minutes clearly document board discussions and decisions. Authority State nonprofit corporation law. Significance Minutes constitute the official, legal record of the acts of the corporation.</p> | <p>Do board members have difficulty restating or understanding motions during their discussion?</p> <p>Do board members have difficulty</p> | |

Executive Director Questions

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|---|---|---|
| <p><input type="checkbox"/> Warning Sign (Check if true) Ambiguous or incomplete information in minutes prevents members and other parties from understanding the actions and decisions of the board.</p> <p>1.4 The board had more than 70% membership participation in the past twelve months.</p> <p>Significance Vacant seats or nonparticipating members limit the representativeness of a board.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Low participation may result in official decisions being made by a minority of board members.</p> | <p>understanding motions after they have been published in minutes? Do you have difficulty understanding motions after they have been published in minutes?</p> <p>Compute this ratio: Sum of attendees at meetings in last 12 months</p> <p># of board seats * number of meetings in last 12months</p> <p>Can you tell me what the participation rate for board members has been over the past 12 months. If not, give them the ratio above.</p> <p>Explain the reasons for vacancies & absenteeism. What steps has the board, with your assistance, taken to reduce them?</p> | |
| <p>1.5 The board is knowledgeable about the statutory and regulatory requirements of its work.</p> <p>Authority OCS Information Memorandum #82</p> <p>Significance Board members must understand its obligations to "play by the rules" contained in legislation, OMB Financial Management circulars, grants, contracts, etc.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Failure to comply with these requirements can lead to audit findings, monitoring findings, disallowed</p> | <p>Does your board understand the 3 sector representation responsibility set by the Community Services Block Grant?</p> <p>Have your bylaws been checked against the requirements of your state's nonprofit corporation law?</p> <p>Has your board sought outside "expert" help in updating any of these documents?</p> <p>Do you and your program directors inform your board of special limitations contained in grant awards and contracts?</p> | |

Executive Director Questions

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|--|--|--|
| <p>costs, and possible loss of funding.</p> <p>1.6 The board maintains current organizational documents. Authority OCS Information Memorandum #82</p> <p>Significance The board must understand its obligations to be current in its organizational documents.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Failure to comply with these requirements can lead to ineligibility for funding, legal liabilities, lack of clarity about the organization's mission.</p> | <p>Have your articles of incorporation been revised recently?</p> <p>When were the board's bylaws last reviewed? Revised? What changes?</p> <p>Does your bylaws have a conflict of interest provision?</p> <p>Do board members sign a conflict of interest declaration? When?</p> <p>Have board members signed code of ethics? When?</p> | |
| <p>1.7 Board members are knowledgeable about board structure and functioning. Authority OCS Information Memorandum #82</p> <p>Significance The board should be well informed about how the board is organized.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Lack of clarity and understanding of the bylaws can lead to improper or illegal actions by the board.</p> | <p>How many regular meetings does the board hold each year and when are they scheduled?</p> <p>How many days ahead of meetings do you send the agenda and other meeting materials?</p> <p>Which board committees meet regularly and recommend action to the full board?</p> <p>When is your annual meeting and what happens at it?</p> | |
| <p>1.8 The board leads organizational mission definition, long- and short-range planning. Authority OCS Information Memorandum #82</p> <p>Significance The board is responsible to set, protect, and advance the organization's</p> | <p>Does the board require and participate in a comprehensive community assessment?</p> <p>How often is the community assessment conducted?</p> <p>Describe how board members participate in regular long-range, or strategic, planning.</p> | |

Executive Director Questions

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|--|--|---|
| <p>strategic direction.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Failure to set, protect, and advance the organization's strategic direction may result in a lack of focus and purpose in the organization, leading to involvement in unsustainable activities.</p> | <p>Describe the last time the board participated in re-thinking the organization's values and mission statement.</p> <p>Has the organization found itself involved in programs or activities that it couldn't maintain?</p> <p>Has the organization found itself involved in programs or activities that didn't seem to "fit" its mission?</p> | |
| <p>1.9 The board carries out its responsibility to approve and oversee the organization's administrative and financial management policies and procedures.</p> <p>Authority OCS Information Memorandum #82</p> <p>Significance The board needs to be clear about its responsibilities to set agency policies and to verify their implementation.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Failure to adopt and follow policies and procedures can expose the organization to audit and monitoring findings, as well as possible legal liabilities.</p> | <p>How often does the board review CAA financial policies and procedures?</p> <p>Does the CAA obtain outside expert advice when revising financial policies and procedures? Who? When?</p> <p>Does the board receive a direct report on the annual agencywide audit?</p> <p>What did the last annual agencywide audit report say about your CAA's financial management practices?</p> <p>Have any recent program monitoring reports raised any concerns about your CAA's financial management practices?</p> | |
| <p>1.10 The board carries out its responsibility to approve and oversee the organization's personnel/human resources policies and procedures.</p> <p>Authority OCS Information Memorandum</p> | <p>How often does the board review CAA personnel policies and procedures?</p> <p>Does the CAA obtain outside expert advice when revising personnel policies and procedures?</p> | |

Executive Director Questions

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|---|--|---|
| <p>#82</p> <p>Significance The board needs to be clear about its responsibilities to set agency policies and to verify their implementation.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Failure to adopt and follow policies and procedures can expose the organization to audit and monitoring findings, as well as possible legal liabilities.</p> | <p>Have any recent program monitoring reports raised any concerns about your CAA's personnel management practices? Which program? What concerns?</p> | |
| <p>1.11 The board conducts systematic oversight of its programs and services.</p> <p>Authority OCS Information Memorandum #82</p> <p>Significance The board is responsible for ensuring that all programs and services are operated in compliance.</p> <p><input type="checkbox"/> Warning Sign (Check if true) The board has final legal responsibility for all actions of the organization.</p> | <p>Does the board vote to accept all grants and contracts, including their budgets?</p> <p>Does the board receive all funder reports on monitoring of CAA programs?</p> <p>Does the board have specific procedures to evaluate your CAA's programs on a regular basis?</p> <p>Does the staff provide -- without being asked -- action plans to correct any areas of noncompliance or deficiency identified in funder monitoring?</p> | |
| <p>1.13 The board carries out its responsibilities for employing, leading, and evaluating the executive director.</p> <p>Authority OCS Information Memorandum #82</p> <p>Significance The board needs to be clear about its responsibilities toward the executive. The executive director needs to be confident that performance expectations have been clearly defined and communicated.</p> | <p>Does you have a contract?</p> <p>If not, are you included on your CAA's wage schedule?</p> <p>Describe the goals and objectives the board has established for you for the current fiscal year and how they were arrived at.</p> <p>Are those goals and objectives in a written document?</p> | |

Executive Director Questions

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|--|--|---|
| <input type="checkbox"/> Warning Sign (Check if true) Lack of clarity and understanding of the board's role can lead to executive dominance of the board and/or divergence from the CAA's mission and strategic plan. | Do you and each board member have a copy of that document? Does the board use a formal, written process to evaluate you? How many board members participate in your evaluation? Describe that participation. | |

Summary

Do you regard this CAA's as at risk in governance? Justify.

What corrective actions must the CAA take to normalize its governance? Describe the resulting condition and what evidence you will accept of proof of achievement of that condition?

Do you recommend strengthening particular governance practices? List.

Financial Management and Condition

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|---|---|---|
| 2.2 Grantee uses a single set of financial management policies and procedures. Authority Citation of statutory and/or regulatory requirement that must be met. Significance This is an OMB Circular requirement. Programs may have additional or more stringent requirements but should never be exempted from general policies or procedures. <input type="checkbox"/> Warning Sign (Check if true) An agency | Does your CAA have different financial policies and procedures for any of your programs? Are those differences required by a contract or some program guidelines? Have all versions been approved by your board? How do you ensure that your financial policies and procedures comply with the most current rules and regulations? How do you determine whether | |

Executive Director Questions

| Indicator | What I Should Look For | Evidence from Documents, Interviews, Observations |
|--|--|--|
| <p>without written, board-approved financial management policies and procedures—that they actually follow—cannot claim to have adequate internal controls. Procedures that are not uniformly applied cannot be said to be adequately implemented. This will lead to adverse audit reports.</p> | <p>important financial transactions like use of purchase orders or bidding for major purchases are being handled consistently with the policies and procedures the board has approved? How do you ensure that major financial management functions must be handled, reviewed, or approved by more than one person?</p> | |
| <p>2.3 The board approves all organizational obligations. Authority Citation of statutory and/or regulatory requirement that must be met. Significance The board holds ultimate legal responsibility for the organization. Any agreement that creates a liability for the grantee needs to be approved by the board. <input type="checkbox"/> Warning Sign (Check if true) The board needs to be aware of significant commitments made to other parties. The viability or existence of the organization could be threatened if it is unable to meet its obligations.</p> | <p>Do board members understand their legal responsibility for the obligations of your CAA? Has the board defined some actions that only it can approve? Are those limits spelled out in your bylaws? Financial policies and procedures? Your contract or job description? Other policy guidance? Describe the organizational obligations (funds applications, grants, contracts, loans, mortgages, fringe benefits, pay schedule, budgets, etc.) that must be submitted to the board for review and approval. Is board approval of legal obligations adequately documented in board minutes?</p> | |
| <p>2.4 The board and program directors receive timely and accurate monthly financial statements.</p> | <p>Does each program/account have a current, board-approved budget?</p> | |

Executive Director Questions

| Indicator | What I Should Look For | Evidence from Documents, Interviews, Observations |
|---|--|--|
| <p>Authority Citation of statutory and/or regulatory requirement that must be met.</p> <p>Significance Up-to-date financial information is essential to understanding the current and future well-being of the organization.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Inaccurate and/or out of date financial information could lead to over- or under-spending of budgets, leading to possible findings of deficiency, noncompliance, funding reduction, or defunding, leaving the organization with obligations it might have to meet from unrestricted funds.</p> | <p>Does the agency have a master budget? What financial documents are routinely distributed to the board and accepted by it?</p> <p>Describe how those documents are explained to the board.</p> <p>Is financial statements report information less than 30 days old? Does it contain actual to budget, program to date comparisons?</p> <p>Are financial statements presented to the board directly generated from your accounting software? Is the information the board receives supported by such documents?</p> <p>Do board members and program directors gain a clear understanding of the organization's financial well-being from the information they receive?</p> <p>Can the staff and the board identify possible vulnerability for the organization from the financial information they receive?</p> | |
| <p>2.5 The board receives a reconciled Balance Sheet twice a year.</p> <p>Authority Citation of statutory and/or regulatory requirement that must be met.</p> <p>Significance This document depicts the overall well-being of the organization, not just</p> | <p>Can you explain the difference between a financial statement and a balance sheet?</p> <p>When was the last time the board had your CAA's balance sheet explained to it?</p> <p>Is your CAA worth more than it owes, should it have to close? By how much?</p> | |

Executive Director Questions

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|--|--|--|
| <p>of individual accounts. It is a primary tool for boards to identify changes in the global viability of the organization. An effective finance director should be able to produce a balance sheet at any time and explain and justify every number on it.</p> <p><input type="checkbox"/> Warning Sign (Check if true) A negative assets to liabilities ratio means the organization could not clear all its debts by liquidating all its assets. Rapid changes (particularly toward declining or negative asset to debt ratios) signal possible loss of financial control and increasing vulnerability or crisis.</p> | <p>Do you know whether that number has changed in the last one to three years? By how much? In which direction?</p> | |
| <p>2.6 Administrative expenses are distributed on the basis of a board-approved cost allocation plan or an approved indirect cost rate.</p> <p>Authority This is an OMB circulars requirement.</p> <p>Significance A consistent set of criteria or justifications must be used to assign administrative costs to funding sources.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Failure to have and follow an approved cost allocation plan can lead to adverse audits, program monitoring findings of deficiency or noncompliance, reduction or denial of funding, or requirement to repay questioned costs from unrestricted funds.</p> | <p>Explain your method of administrative cost allocation: indirect cost rate or cost allocation plan?</p> <p>How did you justify or support this plan and rate?</p> <p>Has your auditor reviewed and approved your plan? your funders? your board?</p> | |

Executive Director Questions

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|--|--|---|
| <p>2.7 Approved purchasing policies and procedures are consistently followed. Authority This is an OMB circular requirement.</p> <p>Significance Adherence to written, approved purchasing procedures provide internal control in an area of financial management easy to abuse.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Failure to have and follow an approved purchasing policies and procedures can lead to adverse audits, program monitoring findings of deficiency or noncompliance, reduction or denial of funding, or requirement to repay questioned costs from unrestricted funds.</p> | <p>Describe your purchasing policies and procedures.</p> <p>Have they been approved by the board?</p> <p>When were they last reviewed by the board?</p> | |
| <p>2.8 Reports to funders are submitted accurately and on time. Authority This is a requirement of grants and contracts, as well as OMB circulars.</p> <p>Significance Reports on progress toward program goals and on spending compared with budgets are a major tool for staff, the board, and funders to regularly assess grantee performance.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Failure to file accurate and timely reports can lead to adverse audits, program monitoring findings of deficiency or noncompliance, reduction or denial of funding, or requirement to repay questioned costs from unrestricted funds. It implies lack of management control.</p> | <p>Are reports consistently filed by reporting deadlines?</p> <p>Are reports approved by the board before they are sent in?</p> <p>Do you have problems producing timely, accurate reports? Describe.</p> <p>Have funders returned any reports for completion or correction?</p> <p>What action have you taken to eliminate timely, accurate reporting problems?</p> | |

Executive Director Questions

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|---|---|---|
| <p>2.9 Findings, disallowed costs, qualified opinions, and management advisories cited in audit reports and management letters are promptly corrected.</p> <p>Authority An OMB circular requirement. May also appear in grant and contracts conditions.</p> <p>Significance An audit provides the board with an independent, "outside" and professional opinion on the likely accuracy and trustworthiness of the grantee's financial operations. Auditors can focus the board's attention on internal controls that need strengthening.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Failure to correct such conditions can lead to adverse audits, program monitoring findings of deficiency or noncompliance, reduction or denial of funding, or requirement to repay questioned costs from unrestricted funds. It is also evidence of lack of management control.</p> | <p>How seriously does your board take concerns or issues raised in your annual audit report?</p> <p>Have any financial management concerns been cited in the last three audits?</p> <p>Were any such concerns presented to the board by the auditor?</p> <p>Have any of these concerns come up more than one year?</p> <p>Did the board direct staff to carry out corrective action? Was that corrective action reported to and accepted by the board?</p> <p>Were any employees disciplined because these concerns were raised or because they were not fixed?</p> | |
| <p>2.11 There are no unfunded liabilities.</p> <p>Authority Citation of statutory and/or regulatory requirement that must be met.</p> <p>Significance Such unfunded obligations may shift the asset to liabilities ratio to negative.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Having to meet these obligations may place great strain on the agency's cash management and cash reserves. This may result in spending of grant funds for non-allowable purposes, or</p> | <p>Are you aware of any obligations your CAA owes to its employees or its creditors that have not been budgeted for? Examples might include:</p> <ul style="list-style-type: none"> - Bills or other debts that are not being paid - Employees' accrued annual leave - Taxes owed that have not been paid on time | |

Executive Director Questions

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|--|---|--|
| <p>necessitate obtaining or increasing a line of credit.</p> <p>2.12 Funders have disallowed program costs. Authority Grant awards or contracts. Significance Disallowed costs can not be paid from grant/contract funds or be reimbursed to the funder from unrestricted funds. <input type="checkbox"/> Warning Sign (Check if true) Having to meet these obligations may place great strain on the agency's cash management and cash reserves. This may result in spending of grant funds for non-allowable purposes, or necessitate obtaining or increasing a line of credit.</p> <p>2.13 Bills and expenses are paid within 30 days of receipt or due date. Authority Citation of statutory and/or regulatory requirement that must be met. Significance Timely payment indicates good cash management and provides documentation for prompt reimbursement claims filing. <input type="checkbox"/> Warning Sign (Check if true) Inability to pay obligations timely may indicate cash flow and balance sheet problem—evidence of over-expenditure, non-allowable spending, or use of funds from one program to pay expenses of another.</p> | <p>- Large, long-term mortgages or loans</p> <p>Have any of your funding sources told your CAA that some expenses will not be reimbursed? When? What program(s)? What action did the staff and board take to resolve the situation(s)?</p> <p>How long does it take for your program's bills to be paid? Do you ever hear from vendors that their bills have not been on time?</p> | |

Summary

Executive Director Questions

Do you regard this as a CAA at financial risk? Justify.

What corrective actions must the CAA take to stabilize its financial management or condition? Describe the resulting condition and what evidence you will accept of proof of achievement of that condition?

Do you recommend strengthening particular financial management practices? List.

Human Resources

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|---|---|---|
| <p>3.1 Grantee complies with all state and federal regulations contained in the state CSBG plan.</p> <p>Authority These are based in federal and state legislation and regulation.</p> <p>Significance Observing these regulations is a requirement for funding.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Failure to meet these requirements can lead to adverse audits, program monitoring findings of deficiency or noncompliance, delayed, reduced or denied funding, or requirement to repay questioned costs from unrestricted funds. It is also evidence of lack of management control.</p> | <p>Are you aware of the compliance assurances that your CAA must give as part of its CSBG funding plan/application?</p> <p>Do you believe that your CAA has complied with all of its legal and regulatory responsibilities?</p> <p>What is the basis for your answer?</p> | |
| <p>3.2 The grantee has a board-approved set of employment policies and procedures.</p> <p>Authority text</p> <p>Significance The terms and conditions of employment must be formally established and approved by the board so that all employees can be treated consistently.</p> | <p>When were your employment policies and procedures most recently approved by the board?</p> <p>Was board approval recorded in the minutes?</p> <p>Have all employees have received training in the employment policies and</p> | |

Executive Director Questions

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|---|---|---|
| <p><input type="checkbox"/> Warning Sign (Check if true) Inconsistency in the treatment of employees can open the grantee up to grievances and law suits that could undermine its credibility and viability.</p> <p>3.3 The employment policies and procedures include a hiring process that is consistently used and documented. Authority text Significance Adherence to written, board-approved hiring processes protects the grantee against accusations of abuse or favoritism in employment.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Inconsistent employment practices are demoralizing to staff and employment-related legal actions can be costly and divert staff time and energy from delivery of quality services.</p> <p>3.4 All positions have been properly classified as to their salaried or non-salaried status. Authority The IRS (?? Department of Labor??) has strict regulations about the criteria that determine salaried or non-salaried status. Significance This classification affects what</p> | <p>procedures (signed document in their personnel file). Does each employee have a copy of the employee manual? Have any employment grievances or complaints arisen from misunderstanding of the personnel policies and procedures? Are approved hiring, disciplinary, and termination policies and procedures followed throughout the organization? Are hiring and firing functions performed by an HR employee to ensure consistency throughout the organization? Has the board been informed of any/all employment-related legal actions? Has the CAA resolved all employment grievances or legal actions?</p> | |
| <p>3.4 All positions have been properly classified as to their salaried or non-salaried status. Authority The IRS (?? Department of Labor??) has strict regulations about the criteria that determine salaried or non-salaried status. Significance This classification affects what</p> | <p>Have your positions been classified as salaried or non-salaried. Is the classification contained on each job description? IF NO...Are you aware of the legal importance of classifying jobs as salaried or non-salaried? Explain. Was the classification determination</p> | |

Executive Director Questions

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|--|--|--|
| <p>kinds of responsibilities can be assigned to employees, the amount of supervision they receive or exercise, and whether they must be paid overtime.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Significant financial penalties can result from improper job classification, including grantee obligation to pay back wages (particularly overtime), benefits, and related fines. These costs and legal fees would have to be paid out of unrestricted funds.</p> | <p>made or reviewed by a qualified HR professional?</p> <p>Do your job postings and advertisements specify whether positions advertised are salaried or non-salaried?</p> | |
| <p>3.5 The board has approved a pay schedule, based on a current wage comparability study.</p> <p>Authority This is an OMB circular requirement.</p> <p>Significance Pay equity should be based on objective data and a well-defined matrix of job classifications and pay ranges. Such a plan provides the rationale for what employees are paid.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Pay decisions not supported by the pay schedule can result in grievances, complaints, legal actions, and financial obligations to the grantee that must be paid out of unrestricted funds.</p> | <p>When was the most recent wage comparability study conducted by or for your CAA?</p> <p>Was the study performed by a qualified human resources professional?</p> <p>Did you create, and did your board approve, a pay schedule based on information from your wage comparability study?</p> <p>Do you have more than one pay schedule or plan (employee plan; union contract; executive director contract)?</p> <p>Are there significant differences between these plans? Have the differences affected employee morale?</p> | |
| <p>3.6 The grantee has a board-approved fringe benefits plan.</p> <p>Authority text</p> <p>Significance Fringe benefits are important</p> | <p>Do you have more than one fringe benefits package or plan (employee plan; union contract; executive director contract)?</p> | |

Executive Director Questions

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|---|---|--|
| <p>incentives to recruiting and retaining employees. Fringe benefits must be offered equally to all employees. Employees under contract (e.g. executive director, those under a union contract) can be offered different benefits.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Failure to maintain fringe benefits (pay for them), or to provide them unequally, could create legal and financial liabilities for the grantee.</p> <p>3.7 Employee performance evaluations are conducted regularly and consistently.</p> <p>Authority text Significance Performance evaluations provide the basis for disciplinary, promotion, reduction in force, and termination decisions. They are an important source of feedback to employees.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Personnel actions unsupported by a history of performance evaluation could be contested by employees, generating legal and financial obligations to the grantee that would have to be paid out of unrestricted funds.</p> <p>3.8 The grantee benefits from stable management leadership.</p> <p>Authority text Significance Stability in management leadership positions tends toward continuity in grantee operation.</p> | <p>Are there significant differences between these plans? Have the differences affected employee morale?</p> <p>Has your board approved all benefit plans (minutes). Most recent date of approval.</p> <p>Have you had any fringe-related grievances, complaints, or legal actions?</p> <p>How often is employee performance evaluated?</p> <p>How is the evaluation done? (interview, evaluation form)</p> <p>Is the same evaluation process/instrument used for all employees? If not, explain the differences.</p> <p>What are the disciplinary procedures in your CAA?</p> <p>What are the grievance procedures in your CAA?</p> <p>If you have had a recent contested evaluation or a disciplinary action, describe how that was handled.</p> <p>Has your CAA experienced significant turnover in recent years?</p> <p>What has been the effect on programs or on the organization as a whole?</p> <p>What steps have been taken to identify</p> | |

Executive Director Questions

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|---|--|--|
| <p><input type="checkbox"/> Warning Sign (Check if true) Changes in management leadership shift leadership attention and energy from program improvement and strategic thinking to training and assimilation of new managers. Frequent changes in leadership (more than one per year or frequent changes in one position) disrupt program management and undermine morale.</p> | <p>and address high turnover?</p> | |
| <p>3.9 The grantee has program and/or individual staff development/training plans.</p> <p>Authority A CSBG contractual requirement???</p> <p>Significance Regular, planned training builds employee competencies and improves program performance. Regular training indicates the grantee values employees and has a commitment to high program performance.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Failure to train employees or to upgrade their job skills indicates organizational indifference to employees and limited commitment to service excellence. Low employee and program performance can lead to adverse monitoring results, up to loss of funding and obligations to repay funders.</p> | <p>Do your personnel policies provide for individual development or team training?</p> <p>Do employees develop and carry out individual development plans?</p> <p>How do you document education or training provided to, or received by, employees?</p> <p>Do employees provide any feedback on the value of training or education they have received?</p> | |

Summary

Executive Director Questions

Do you regard this as a CAA at risk in its human resources practices? Justify.

What corrective actions must the CAA take to normalize/legalize its human resources practices? Describe the resulting condition and what evidence you will accept of proof of achievement of that condition?

Do you recommend strengthening particular human resources practices? List.

| Planning | | |
|---|--|--|
| Indicator | What I Should Look For | Evidence from Documents, Interviews, Observations |
| <p>4.1 Grantee has completed a community assessment within the past three years. Authority A state CSBG requirement (citation) Significance A CAA must understand its community and the populations it serves in order to be responsive to them. It must also understand the resources and network of social service providers in order to assess its most effective role(s) in that network.</p> <p><input type="checkbox"/> Warning Sign (Check if true) CAAs that do not understand their community will likely be perceived as "outsiders," as duplicating services, as unresponsive to the community. Lack of community understanding will limit the CAA's capacity to leverage resources and to focus its efforts where they can have the greatest benefit.</p> | <p>Describe the most recent community assessment prepared by your CAA.</p> <p>What was your opinion of the quality and usefulness of the community assessment?</p> <p>Was the current community assessment presented to committees and the board?</p> <p>How was the community assessment used in development of strategic, CSBG, and program plans?</p> | |
| <p>4.2 The grantee is guided by a strategic plan completed within the last five years. Authority A state CSBG requirement (citation) Significance The approval and use of a strategic plan indicates an organization aware of its priorities and</p> | <p>Describe the most recent strategic plan prepared by your CAA.</p> <p>Was information collected on enough topics to produce a comprehensive picture of the</p> | |

Executive Director Questions

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|---|---|---|
| <p>possessing a sense of direction. Strategic plans define the conversation board and staff leadership should be having.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Lack of, or failure to use, a strategic plan indicates the grantee lacks a sense of priorities and is operating reactively and passively. It indicates indifference to the conditions in its community and the needs of the populations it serves.</p> | <p>communities your CAA serves? How useful was the information collected for your CAA's planning process? Was the information analyzed and discussed by a good cross section of staff, board, and community partners? Was the community assessment presented to the board? Was the community assessment information valuable to the development of the current strategic plan? Was the current strategic plan presented to committees and the board? Describe how the strategic plan was used in development of CSBG and other program plans.</p> | |
| <p>4.3 The grantee has implemented state-defined ROMA practices. Authority PL 105-385, 676(b)(II)(D)(12). State CSBG plan and CAA contracts. Significance The Community Services Block grant requires that states and grantees participate in ROMA or some other performance measurement system. Use of a performance measurement system also indicates a CAA's commitment to achievement</p> | <p>How have you incorporated ROMA concepts into CAA planning and management activities? Has the board of directors incorporated ROMA concepts into its planning and monitoring activities? Describe your adoption of the</p> | |

Executive Director Questions

| Indicator | What I Should Look For | Evidence from Documents, Interviews, Observations |
|---|--|---|
| <p>and documentation of the changes it is able to bring about for families and communities.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Failure to participate in ROMA or other measurement system could lead to adverse monitoring reports and possible delay, denial, and termination of funding.</p> <p>4.4 Grantee reports progress on its plans to its board of directors at least semi-annually.</p> <p>Authority text</p> <p>Significance The board of directors can not make informed decisions without accurate and current information about program performance. Reports on that performance need to be frequent and understandable.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Lack of current, accurate program information may lead management and the board to make decisions or commitments they can't follow through on.</p> | <p>WVFACS data collection system.</p> <p>What program progress reports are presented to committees and the board, in what form, and with what frequency?</p> <p>Has information presented in program progress reports increased board members' understanding of program compliance and positive outcomes for participants?</p> <p>Has the board had to reverse decisions or undo commitments because they received information too late?</p> | |

Summary

Do you regard this as a CAA as weak in implementation of its planning? Justify.

What corrective actions must the CAA take to stabilize its planning practices? Describe the resulting condition and what evidence you will accept of proof of achievement of that condition?

Do you recommend strengthening particular planning practices? List.

Executive Director Questions

Services

| Indicator | What I Should Look For | Evidence from Documents, Interviews, Observations |
|---|--|---|
| <p>5.1 Monitoring reports from funders verify program compliance. Authority Citation of statutory and/or regulatory requirement that must be met. Significance Reports from funding sources provide board and staff with important feedback about program performance. <input type="checkbox"/> Warning Sign (Check if true) A pattern of monitoring reports indicating deficiencies or noncompliance in many programs, or repetition over time of such findings in individual programs, should signal board and management that systems problems need to be attended to.</p> | <p>What program monitoring reports has your CAA received since the last CSBG monitoring (DATE)? Have those reports suggested organizational or program patterns of deficiency and noncompliance? Have these monitoring reports been presented to the board of directors? What actions have been taken to resolve the problems identified by monitoring?</p> | |
| <p>5.2 Participant eligibility, cost allowability, service delivery, and program results have been satisfactorily documented for CSBG-funded activities. Authority Citation of statutory and/or regulatory requirement that must be met. Significance CSBG-funded activities carry the same compliance standards as other programs. Those standards are spelled out in grantee contracts. <input type="checkbox"/> Warning Sign (Check if true) Failure to comply with CSBG requirements could result in delayed, denied, or terminated funding, as well as decertification as a CSBG-eligible entity.</p> | <p>What steps do you take internally to verify that programs comply with requirements related to: - participant eligibility? - Allowable costs? - Allowable activities? - Program outcomes and results?</p> | |

Executive Director Questions

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|--|---|---|
| <p>5.3 Services are provided in cooperation and collaboration with other community organizations. Authority CSBG CAP Plan requirements. Significance CAAs are expected to "leverage" their resources by working with community partners.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Non-cooperating CAAs may be duplicating services or functions already existing at the expense of addressing another unmet need or condition.</p> | <p>Describe the partnerships your CAA has with other organizations and programs.</p> <p>How many of these partnerships revolve around co-funding of programs?</p> <p>Do you have contracts, letters/ memoranda of understanding, or other documents making those partnerships official?</p> <p>Do you have newspaper or other public media evidence of your collaboration? ask for letters, statements or partners.</p> | |
| <p>5.4 CAA staff participate in community service integration and coordination groups. Authority CSBG plan? Significance Staff participation in inter-agency coordination is a first step to higher levels of collaboration.</p> <p><input type="checkbox"/> Warning Sign (Check if true) A CAA that does not participate in inter-agency groups puts the CAA in isolation in the social services community, limiting its capacity to influence community programs and policies.</p> | <p>Do program managers or other staff participate in inter-agency groups at the community, county, or state level?</p> <p>Are minutes or summaries of such meetings circulated to appropriate persons in your CAA?</p> <p>Have any of your CAA staff held leadership positions inter-agency groups?</p> <p>Any media coverage of the work or impact of these groups?</p> | |

Executive Director Questions

Summary

Do you regard this as a CAA at programmatic risk? Justify.

What corrective actions must the CAA take to stabilize its programmatic management or condition? Describe the resulting condition and what evidence you will accept of proof of achievement of that condition?

Do you recommend strengthening particular program management practices? List.

Administration

| Indicator | What I Should Look For | Evidence from Documents, Interviews, Observations |
|---|--|---|
| <p>6.1 Information is rapidly and efficiently communicated throughout the organization. Authority ???.</p> <p>Significance Timely sharing of information maintains employee morale and ensures current awareness of compliance requirements. Two-way communication provides line and program staff with access to CAA leadership.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Employees unaware of current program information may incur disallowable costs or act out of compliance. Employees who feel uninformed and isolated become mistrustful and disgruntled, attitudes and feelings they may communicate to people served and to the community. A CAA that does not communicate its mission and activities to its partners and to the community limits its public good will and forfeits opportunities for community support.</p> | <p>Do you use email to distribute material to or to communicate with board members?</p> <p>Does the CAA's top leadership meet at regular intervals?</p> <p>Do program and/or worksite teams meet at regular intervals?</p> <p>Do teams document their discussions and decisions in minutes or meeting summaries?</p> <p>Are minutes or meeting summaries communicated throughout the organization?</p> <p>Does the CAA have an internal newsletter or other mechanism for sharing information with all employees?</p> <p>What methods and mechanisms</p> | |

Executive Director Questions

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|---|---|---|
| <p>6.2 The organization has an information technology infrastructure that supports timely and efficient communication, data collection, data analysis, and reporting. Authority GOEO CSBG Manual.</p> <p>Significance Electronic network communication increases contact between employees, facilitates collecting, archiving, and tabulating of participant and program information, and reduces the cost of distributing and sharing information. The GOEO has implemented a comprehensive information management system in which all CSBG grantees are required to participate.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Poorly implemented or supported electronic information technology can decrease employee productivity and increase employee dissatisfaction. Employees may be highly challenged by computer technology unless assisted with accessible, adequate technical support.</p> | <p>does the CAA use to tell its story to the community?</p> <p>Does the CAA operate one or more computer networks? Are all central office staff networked? Are all satellite offices networked to the central office? In real time? On a dial-up or Internet access basis? Does the CAA have written computer security policies and procedures for financial, client, and administrative data? Does the CAA have and carry out a system of regular data back-up and off site storage? Does the CAA have an on-site system administrator? If not, who provides that service? Does the CAA have a tech support specialist on staff? Has the CAA completely implemented the WVFACS information system?</p> | |
| <p>6.2 The organization has instituted organization-wide service integration. Authority GOEO CSBG Manual. OCS Information Memorandum #49. CSBG PL 205-185</p> | <p>What mechanisms does the CAA use to bring staff from all programs together to streamline services to low-income people?</p> | |

Executive Director Questions

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|--|---|---|
| <p>Significance CAAs should reduce administrative and functional duplication in order to apply the greatest amount of resources to services. Assistance to low-income people should be provided in the context of their entire living situation.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Resources to assist low-income people and communities are wasted if used to support independent program "silos," duplicated administrative services, multiple staff interacting with families.</p> | <p>Do central administrative functions support many programs or activities or do programs have similar staff who perform the same functions?</p> <p>Does the CAA have policies and procedures to identify and resolve conflicts between programs or departments?</p> <p>Describe how you have encouraged, supported, required administrative and service integration.</p> | |
| <p>6.3 The organization has no pending legal action.</p> <p>Authority GOEO CSBG Manual.</p> <p>Significance Legal actions may drain CAA reserves of unrestricted funds. They occupy the time and attention of administrators.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Legal actions indicate that the CAA has not conducted its activities consistently with its policies and procedures or with laws and regulations. They also suggest that the CAA lacks adequate internal controls to identify and correct improper or inappropriate activities. Successful legal actions may impose monetary obligations the CAA can not meet.</p> | <p>Does the CAA have any unresolved</p> <ul style="list-style-type: none"> - employment grievances - complaints - lawsuits <p>How much does the CAA spend a year on legal expenses?</p> <p>Have you identified any patterns to grievances, complaints, or lawsuits that indicate systemic weaknesses to be addressed.</p> | |

Executive Director Questions

Summary

Do you regard this as a CAA at administrative risk? Justify.

What corrective actions must the CAA take to stabilize its administrative management or condition? Describe the resulting condition(s) and what evidence you will accept as proof such condition(s) have been achieved

What administrative practices do you recommend that the CAA strengthen? List.

Finance Team Questions

Financial Management and Condition

| Indicator | What I Should Look For | Evidence from Documents, Interviews, Observations |
|---|---|---|
| <p>2.1 Bank statements are reconciled monthly against the general ledger. Authority ?.</p> <p>Significance Sound financial management required accurate, current information about financial status.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Unless bank statements are reconciled to the general ledger within 30 days of receipt, financial information can not be treated as timely or accurate.</p> | <p>How does the CAA document bank statement reconciliations against cash and the general ledger?</p> <p>How soon after receipt of bank statements are reconciliations completed?</p> <p>How does the CAA document that reconciliations have been done before accounts are closed for the month in which the statements were issued?</p> <p>How does the CAA document review of reconciliations by the finance director</p> | |
| <p>2.2 Grantee uses a single set of financial management policies and procedures. Authority Citation of statutory and/or regulatory requirement that must be met.</p> <p>Significance This is an OMB Circular requirement. Programs may have additional or more stringent requirements but should never be exempted from general policies or procedures.</p> <p><input type="checkbox"/> Warning Sign (Check if true) An agency without written, board-approved financial management policies and procedures—that they actually follow—cannot claim to have adequate internal controls. Procedures that are not uniformly applied cannot be said to be adequately implemented. This will lead to</p> | <p>Do you use different financial policies and procedures for some elements of your operation? What contractual or regulator authority have you cited for variations or differences? Have all versions been approved by your board?</p> <p>How do you ensure that your financial policies and procedures comply with the most current rules and regulations?</p> <p>How do you determine whether important financial transactions (purchase order use; purchasing procedures) conform to compliant and approved policies and procedures?</p> <p>How do you ensure separation of</p> | |

Finance Team Questions

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|---|---|---|
| <p>adverse audit reports.</p> <p>2.3 The board approves all organizational obligations. Authority Citation of statutory and/or regulatory requirement that must be met. Significance The board holds ultimate legal responsibility for the organization. Any agreement that creates a liability for the grantee needs to be approved by the board. <input type="checkbox"/> Warning Sign (Check if true) The board needs to be aware of significant commitments made to other parties. The viability or existence of the organization could be threatened if it is unable to meet its obligations.</p> | <p>financial duties (checks and balances)?</p> <p>Has the board defined some actions that only it can approve? Are those limits spelled out in your bylaws? Financial policies and procedures? Executive director's contract or job description? Other policy guidance?</p> <p>Describe the organizational obligations (funds applications, grants, contracts, loans, mortgages, fringe benefits, pay schedule, budgets, etc.) that you submit to the board for review and approval.</p> <p>Do board members understand their legal responsibility for obligations of your CAA?</p> <p>Is board approval of legal obligations adequately documented in board minutes?</p> | |
| <p>2.4 The board and program directors receive timely and accurate monthly financial statements. Authority Citation of statutory and/or regulatory requirement that must be met. Significance Up-to-date financial information is essential to understanding the current and future well-being of the organization. <input type="checkbox"/> Warning Sign (Check if true) Inaccurate and/or out of date financial information could</p> | <p>Does each program/account have a current, board-approved budget?</p> <p>Does the agency have a master budget?</p> <p>What financial documents are routinely distributed to the board and accepted by it?</p> <p>Is financial statements report information no more than 30 days old? Does it contain actual to budget, program to date comparisons?</p> | |

Finance Team Questions

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
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| <p>lead to over- or under-spending of budgets, leading to possible findings of deficiency, noncompliance, funding reduction, or defunding, leaving the organization with obligations it might have to meet from unrestricted funds.</p> <p>2.5 The board receives a reconciled Balance Sheet twice a year. Authority Citation of statutory and/or regulatory requirement that must be met. Significance This document depicts the overall well-being of the organization, not just of individual accounts. It is a primary tool for boards to identify changes in the global viability of the organization. An effective finance director should be able to produce a balance sheet at any time and explain and justify every number on it. <input type="checkbox"/> Warning Sign (Check if true) A negative assets to liabilities ratio means the organization could not clear all its debts by liquidating all its assets. Rapid changes (particularly toward declining or negative</p> | <p>Are financial statements presented to the board directly generated from your accounting software, or is the information you give the board supported by such documents? Do board members and program directors gain a clear understanding of the organization's financial well-being from the information they receive? Can the staff and the board identify possible vulnerability for the organization from the financial information they receive?</p> <p>Ask the financial officer to produce a current balance sheet and interpret it. Is the asset to liability ratio negative? By how much? Has this changed within the past year? Do board members know the balance sheet status of the organization and what it means?</p> | |

Finance Team Questions

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|--|---|--|
| <p>asset to debt ratios) signal possible loss of financial control and increasing vulnerability or crisis.</p> | | |
| <p>2.6 Administrative expenses are distributed on the basis of a board-approved cost allocation plan or an approved indirect cost rate. Authority This is an OMB circulars requirement. Significance A consistent set of criteria or justifications must be used to assign administrative costs to funding sources. <input type="checkbox"/> Warning Sign (Check if true) Failure to have and follow an approved cost allocation plan can lead to adverse audits, program monitoring findings of deficiency or noncompliance, reduction or denial of funding, or requirement to repay questioned costs from unrestricted funds.</p> | <p>Explain your method of administrative cost allocation: indirect cost rate or cost allocation plan? How did you justify or support this plan and rate? Has your auditor reviewed and approved your plan? your funders? your board? Test payroll transactions to verify that charges conform to the approved plan.</p> | |
| <p>2.7 Approved purchasing policies and procedures are consistently followed. Authority This is an OMB circular requirement. Significance Adherence to written, approved purchasing procedures provide internal control in an area of financial management easy to abuse. <input type="checkbox"/> Warning Sign (Check if true) Failure to have and follow an approved purchasing policies and procedures can lead to adverse audits, program monitoring findings of</p> | <p>Describe your purchasing policies and procedures. Have they been approved by the board? When were they last reviewed by the board? Verify the existence of written, approved purchasing policies and procedures. Verify in board minutes approval of purchasing policies and procedures. Verify official funder acceptance of the</p> | |

Finance Team Questions

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|---|---|--|
| <p>deficiency or noncompliance, reduction or denial of funding, or requirement to repay questioned costs from unrestricted funds.</p> | <p>cost allocation and purchasing policies and procedures. Review a sample of purchasing transactions to verify that they conform to the approved policies and procedures and are adequately documented.</p> | |
| <p>2.8 Reports to funders are submitted accurately and on time. Authority This is a requirement of grants and contracts, as well as OMB circulars. Significance Reports on progress toward program goals and on spending compared with budgets are a major tool for staff, the board, and funders to regularly assess grantee performance. <input type="checkbox"/> Warning Sign (Check if true) Failure to file accurate and timely reports can lead to adverse audits, program monitoring findings of deficiency or noncompliance, reduction or denial of funding, or requirement to repay questioned costs from unrestricted funds. It is also evidence of lack of management control.</p> | <p>Are reports consistently filed by reporting deadlines? Are reports approved by the board before they are sent in? Do you have problems producing timely, accurate reports? Describe. Have funders returned any reports for completion or correction? What action have you taken to eliminate timely, accurate reporting problems? Check grant/contract files to determine if reports are consistently filed within specified reporting periods. Check grant/contract files to determine if reports have been returned by funders for completion or correction. Determine whether reports are approved for submission by the board before they are sent in.</p> | |
| <p>2.9 Findings, disallowed costs, qualified opinions, and management advisories cited in audit reports and management</p> | <p>How seriously does your board take concerns or issues raised in your annual audit report?</p> | |

Finance Team Questions

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|--|--|---|
| <p>letters are promptly corrected.</p> <p>Authority An OMB circular requirement. May also appear in grant and contracts conditions.</p> <p>Significance An audit provides the board with an independent, "outside" and professional opinion on the likely accuracy and trustworthiness of the grantee's financial operations. Auditors can focus the board's attention on internal controls that need strengthening.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Failure to correct such conditions can lead to adverse audits, program monitoring findings of deficiency or noncompliance, reduction or denial of funding, or requirement to repay questioned costs from unrestricted funds. It is also evidence of lack of management control.</p> | <p>Have any financial management concerns been cited in the last three audits?</p> <p>Were any such concerns presented to the board by the auditor?</p> <p>Have any of these concerns come up more than one year?</p> <p>Did the board direct staff to carry out corrective action? Was that corrective action reported to and accepted by the board?</p> <p>Were any employees disciplined because these concerns were raised or because they were not fixed?</p> | |
| <p>2.10 Property and equipment inventories are less than two years old.</p> <p>Authority This is an OMB circular requirement. It may also be a grant/contract condition.</p> <p>Significance Such records are important to document insurance or damage claims, as well as acquisition or disposition and possible "ownership interest" in contract purchased property.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Failure to</p> | <p>Identify the inventories maintained by the grantee.</p> <p>Determine if inventories contain all data elements required by OMB circulars or funder grants/contracts.</p> <p>Determine if inventories contain all data required by insurance carriers.</p> <p>Determine if required data is consistently documented for all inventory items, subject to availability of information.</p> | |

Finance Team Questions

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|---|---|--|
| <p>maintain compliant, timely inventory records can lead to adverse audits, program monitoring findings of deficiency or noncompliance, reduction or denial of funding, or requirement to repay questioned costs from unrestricted funds. It is also evidence of lack of management control.</p> | <p>Determine whether grantee has, and follows, inventory acquisition and disposition documentation procedures and requirements. Inspect agency equipment for inventory markings or tags. Verify agreement with inventory records.</p> | |
| <p>2.11 There are no unfunded liabilities. Authority Citation of statutory and/or regulatory requirement that must be met. Significance Such unfunded obligations may shift the asset to liabilities ratio to negative. <input type="checkbox"/> Warning Sign (Check if true) Having to meet these obligations may place great strain on the agency's cash management and cash reserves. This may result in spending of grant funds for non-allowable purposes, or necessitate obtaining or increasing a line of credit.</p> | <p>Are you aware of any obligations your CAA owes to its employees or its creditors that have not been budgeted for? Examples might include:</p> <ul style="list-style-type: none"> - Bills or other debts that are not being paid - Employees' accrued annual leave - Taxes owed that have not been paid on time - Large, long-term mortgages or loans | |
| <p>2.12 Funders have disallowed costs. Authority Grant awards or contracts. Significance Disallowed costs can not be paid from grant/contract funds or be reimbursed to the funder from unrestricted funds. <input type="checkbox"/> Warning Sign (Check if true) Having to meet these obligations may place great strain on the agency's cash management and cash reserves. This may result in spending of grant funds for non-allowable purposes, or necessitate obtaining or increasing a line of</p> | <p>Have any of your funding sources told your CAA that some expenses will not be reimbursed? When? What program(s)? What action did the staff and board take to resolve the situation(s)?</p> | |

Finance Team Questions

| Indicator | What I Should Look For | Evidence from Documents, Interviews, Observations |
|--|--|---|
| <p>credit.</p> <p>2.13 Bills and expenses are paid within 30 days of receipt or due date. Authority Citation of statutory and/or regulatory requirement that must be met. Significance Timely payment indicates good cash management and provides documentation for prompt reimbursement claims filing.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Inability to pay obligations timely may indicate cash flow and balance sheet problem—evidence of over-expenditure, non-allowable spending, or use of funds from one program to pay expenses of another.</p> | <p>How long does it take for your program's bills to be paid?</p> <p>Do you ever hear from vendors that their bills have not been on time?</p> <p>Have the finance department produce an aged payable report: determine the ratios of obligations due in less than 30 days, 31-60 days, 61-90 days, 90 days or more.</p> <p>Examine check reconciliations to determine if significant numbers of checks are more than 60 days old before cashed.</p> | |

Summary

Do you regard this as a CAA at financial risk? Justify.

What corrective actions must the CAA take to stabilize its financial management or condition? Describe the resulting condition and what evidence you will accept of proof of achievement of that condition?

Do you recommend strengthening particular financial management practices? List.

Services

| Indicator | What I Should Look For | Evidence from Documents, Interviews, Observations |
|---|--|---|
| <p>5.1 Monitoring reports from funders</p> | <p>Have recent monitoring of programs by</p> | |

Finance Team Questions

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|---|--|---|
| <p>verify program compliance.</p> <p>Authority Citation of statutory and/or regulatory requirement that must be met.</p> <p>Significance Reports from funding sources provide board and staff with important feedback about program performance.</p> <p><input type="checkbox"/> Warning Sign (Check if true) A pattern of monitoring reports indicating deficiencies or noncompliance in many programs, or repetition over time of such findings in individual programs, should signal board and management that systems problems need to be attended to.</p> | <p>funders identified noncompliance or deficiency in financial management or allowed costs?</p> <p>Have monitoring reports suggested patterns of financial deficiency and noncompliance within single programs over time or similar problems in multiple programs?</p> <p>Have these monitoring reports been presented to the board of directors?</p> <p>What actions have been taken to resolve the problems identified by monitoring.?</p> | |
| <p>5.2 Participant eligibility, cost allowability, service delivery, and program results have been satisfactorily documented for CSBG-funded activities.</p> <p>Authority Citation of statutory and/or regulatory requirement that must be met.</p> <p>Significance CSBG-funded activities carry the same compliance standards as other programs. Those standards are spelled out in grantee contracts.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Failure to comply with CSBG requirements could result in delayed, denied, or terminated funding, as well as decertification as a CSBG-eligible entity.</p> | <p>What steps do you take internally to verify that programs comply with requirements related to allowable costs?</p> | |
| <p>5.3 Services are provided in cooperation and collaboration with other community</p> | <p>Do you have contracts, letters/ memoranda of understanding, or other</p> | |

Finance Team Questions

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|---|--|---|
| <p>organizations. Authority CSBG CAP Plan requirements. Significance CAAs are expected to "leverage" their resources by working with community partners. <input type="checkbox"/> Warning Sign (Check if true) Non-cooperating CAAs may be duplicating services or functions already existing at the expense of addressing another unmet need or condition.</p> | <p>documents creating financial partnerships? Who negotiates these agreements? Which of these agreements include payments to other partners or payments by other partners to the CAA? How are these transactions documented?</p> | |
| <p>5.4 CAA staff participate in community service intergration and coordination groups. Authority CSBG plan? Significance Staff participation in inter-agency coordination is a first step to higher levels of collaboration. <input type="checkbox"/> Warning Sign (Check if true) A CAA that does not participate in inter-agency groups puts the CAA in isolation in the social services community, limiting its capacity to influence community programs and policies.</p> | <p>Interview program managers about their participations in inter-agency groups. Determine whether minutes or summaries of such meeting are circulated. Identify leadership positions CAA staff have occupied in inter-agency groups. Ask about media evidence of the work or impact of these groups.</p> | |

Finance Team Questions

Summary

Do you regard this as a CAA at programmatic risk? Justify.

What corrective actions must the CAA take to stabilize its programmatic financial management or condition? Describe the resulting condition(s) and what evidence you will accept of proof of achievement of that condition?

Do you recommend strengthening particular program financial management practices? List.

Administration

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|---|--|---|
| <p>6.1 Information is rapidly and efficiently communicated throughout the organization. Authority ???.</p> <p>Significance Timely sharing of information maintains employee morale and ensures current awareness of compliance requirements. Two-way communication provides line and program staff with access to CAA leadership.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Employees unaware of current program information may incur disallowable costs or act out of compliance. Employees who feel uninformed and isolated become mistrustful and disgruntled, attitudes and feelings they may communicate to people served and to the community. A CAA that does not communicate its mission and activities to its partners and to the community limits its public good will and forfeits opportunities for community support.</p> | <p>Do you use email to distribute material to or to communicate with members of your staff or other employees?</p> <p>Board members?</p> <p>Funding sources?</p> | |
| <p>6.2 The organization has an information</p> | <p>Does the CAA have written</p> | |

Finance Team Questions

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|--|---|---|
| <p>technology infrastructure that supports timely and efficient communication, data collection, data analysis, and reporting. Authority GOEO CSBG Manual. Significance Electronic network communication increases contact between employees, facilitates collecting, archiving, and tabulating of participant and program information, and reduces the cost of distributing and sharing information. The GOEO has implemented a comprehensive information management system in which all CSBG grantees are required to participate.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Poorly implemented or supported electronic information technology can decrease employee productivity and increase employee dissatisfaction. Employees may be highly challenged by computer technology unless assisted with accessible, adequate technical support.</p> | <p>computer security policies and procedures for financial data?</p> <p>Does the CAA have and carry out a system of regular data back-up and off site storage?</p> <p>Does the CAA have an on-site system administrator? If not, who provides that service?</p> <p>Does the CAA have a tech support specialist on staff?</p> <p>Has the CAA completely implemented the WVFACS information system?</p> | |
| <p>6.2 The organization has instituted organization-wide service integration. Authority GOEO CSBG Manual. OCS Information Memorandum #49. CSBG PL 205-185 Significance CAAs should reduce administrative and functional duplication in order to apply the greatest amount of resources to services. Assistance to low-income people should be provided in the context of their entire living situation.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Resources to assist low-income people and communities are wasted if used to support independent program "silos," duplicated</p> | <p>What mechanisms does the CAA use to bring staff from all programs together to streamline services to low-income people?</p> <p>Do central administrative functions support many programs or activities or do programs have similar staff who perform the same functions?</p> <p>Does the CAA have policies and procedures to identify and resolve conflicts between</p> | |

Finance Team Questions

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|--|---|---|
| administrative services, multiple staff interacting with families. | Describe how you have encouraged, supported, required administrative and service integration. | |
| <p>6.3 The organization has no pending legal action.</p> <p>Authority GOEO CSBG Manual.</p> <p>Significance Legal actions may drain CAA reserves of unrestricted funds. They occupy the time and attention of administrators.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Legal actions indicate that the CAA has not conducted its activities consistently with its policies and procedures or with laws and regulations. They also suggest that the CAA lacks adequate internal controls to identify and correct improper or inappropriate activities. Successful legal actions may impose monetary obligations the CAA can not meet.</p> | Does the CAA have any unresolved <ul style="list-style-type: none"> - employment grievances - complaints - lawsuits Have you identified any patterns to grievances, complaints, or lawsuits that indicate systemic weaknesses to be addressed. | |

Summary

Do you regard this as a CAA at administrative risk? Justify.

What corrective actions must the CAA take to stabilize its administrative management or condition? Describe the resulting condition(s) and what evidence you will accept as proof such condition(s) have been achieved

What administrative practices do you recommend that the CAA strengthen? List.

Leadership Team Questions

Governance

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|---|--|---|
| <p>1.1 Board members were elected in accordance with grantee bylaws, CSBG legislation and regulations. Authority Public Law 105-285, 676B(a); Information Memorandum #82.</p> <p>Significance CSBG requires board have a tripartite structure and provide for democratic election of low income representatives.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Failure to comply with these requirements would be grounds of findings of non-compliance and possible decertification.</p> | <p>What do you know about how members of the board of directors are selected, seated, and replaced?</p> | |
| <p>1.3 Minutes clearly document board discussions and decisions. Authority State nonprofit corporation law.</p> <p>Significance Minutes constitute the official, legal record of the acts of the corporation.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Ambiguous or incomplete information in minutes prevents members and other parties from understanding the actions and decisions of the board.</p> | <p>Do you have difficulty understanding motions after they have been published in the board minutes?</p> | |
| <p>1.5 The board is knowledgeable about the statutory and regulatory requirements of its work. Authority OCS Information Memorandum #82</p> <p>Significance Board members must understand its obligations to "play by the rules" contained</p> | <p>Do you inform your board of special limitations contained in grant awards and contracts?</p> | |

Leadership Team Questions

| Indicator | What I Should Look For | Evidence from Documents, Interviews, Observations |
|---|--|--|
| <p>in legislation, OMB Financial Management circulars, grants, contracts, etc.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Failure to comply with these requirements can lead to audit findings, monitoring findings, disallowed costs, and possible loss of funding.</p> | | |
| <p>1.8 The board leads organizational mission definition, long- and short-range planning.</p> <p>Authority OCS Information Memorandum #82</p> <p>Significance The board is responsible to set, protect, and advance the organization's strategic direction.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Failure to set, protect, and advance the organization's strategic direction may result in a lack of focus and purpose in the organization, leading to involvement in unsustainable activities.</p> | <p>Does the board require and participate in a comprehensive community assessment?</p> <p>How often is the community assessment conducted?</p> <p>Describe how you and your staff participate in regular long-range, or strategic, planning.</p> <p>Describe the last time you and your staff participated in re-thinking the organization's values and mission statement.</p> <p>Has the organization found itself involved in programs or activities that it couldn't maintain?</p> <p>Has the organization found itself involved in programs or activities that didn't seem to "fit" its mission?</p> | |
| <p>1.9 The board carries out its responsibility to approve and oversee the organization's administrative and financial management policies and procedures.</p> <p>Authority OCS Information Memorandum #82</p> | <p>How often does the board review CAA financial policies and procedures?</p> <p>Does the CAA obtain outside expert advice when revising financial policies and procedures? Who? When?</p> <p>Does the board receive a direct report on</p> | |

Leadership Team Questions

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|--|--|---|
| <p>Significance The board needs to be clear about its responsibilities to set agency policies and to verify their implementation.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Failure to adopt and follow policies and procedures can expose the organization to audit and monitoring findings, as well as possible legal liabilities.</p> | <p>the annual agencywide audit?</p> <p>What did the last annual agencywide audit report say about your CAA's financial management practices?</p> <p>Have any recent program monitoring reports raised any concerns about your CAA's financial management practices?</p> | |
| <p>1.10 The board carries out its responsibility to approve and oversee the organization's personnel/human resources policies and procedures. Authority OCS Information Memorandum #82</p> <p>Significance The board needs to be clear about its responsibilities to set agency policies and to verify their implementation.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Failure to adopt and follow policies and procedures can expose the organization to audit and monitoring findings, as well as possible legal liabilities.</p> | <p>How often does the board review CAA personnel policies and procedures?</p> <p>Does the CAA obtain outside expert advice when revising personnel policies and procedures?</p> <p>Have any recent program monitoring reports raised any concerns about your CAA's personnel management practices? Which program? What concerns?</p> | |
| <p>1.11 The board conducts systematic oversight of its programs and services. Authority OCS Information Memorandum #82</p> <p>Significance The board is responsible for ensuring that all programs and services are operated in compliance.</p> <p><input type="checkbox"/> Warning Sign (Check if true) The board has final legal responsibility for all actions of</p> | <p>Does the board vote to accept all grants and contracts, including their budgets?</p> <p>Does the board receive all funder reports on monitoring of CAA programs?</p> <p>Does the board have specific procedures to evaluate your CAA's programs on a regular basis?</p> <p>Does the staff provide—without being</p> | |

Leadership Team Questions

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|-------------------|---|---|
| the organization. | asked—action plans to correct any areas of noncompliance or deficiency identified in funder monitoring? | |

Summary

Do you regard this CAA’s as at risk in governance? Justify.

What corrective actions must the CAA take to normalize its governance? Describe the resulting condition and what evidence you will accept of proof of achievement of that condition?

Do you recommend strengthening particular governance practices? List.

Financial Management and Condition

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|---|---|---|
| <p>2.2 Grantee uses a single set of financial management policies and procedures. Authority Citation of statutory and/or regulatory requirement that must be met. Significance This is an OMB Circular requirement. Programs may have additional or more stringent requirements but should never be exempted from general policies or procedures. <input type="checkbox"/> Warning Sign (Check if true) An agency without written, board-approved financial management policies and procedures—that they actually follow—cannot claim to have adequate internal controls. Procedures that are not uniformly applied cannot be said to be</p> | <p>Does your CAA have different financial policies and procedures for any of your programs? Are those differences required by a contract or some program guidelines? Have all versions been approved by your board? How do you ensure that your financial policies and procedures comply with the most current rules and regulations? How do you determine whether important financial transactions like use of purchase orders or bidding for major purchases are being handled consistently with the policies and</p> | |

Leadership Team Questions

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|--|---|--|
| <p>adequately implemented. This will lead to adverse audit reports.</p> | <p>procedures the board has approved? How do you ensure that major financial management functions must be handled, reviewed, or approved by more than one person?</p> | |
| <p>2.3 The board approves all organizational obligations. Authority Citation of statutory and/or regulatory requirement that must be met. Significance The board holds ultimate legal responsibility for the organization. Any agreement that creates a liability for the grantee needs to be approved by the board. <input type="checkbox"/> Warning Sign (Check if true) The board needs to be aware of significant commitments made to other parties. The viability or existence of the organization could be threatened if it is unable to meet its obligations.</p> | <p>Has the board defined some actions that only it can approve? Are those limits spelled out in your bylaws? Financial policies and procedures? Executive director's contract or job description? Other policy guidance? Describe the organizational obligations (funds applications, grants, contracts, loans, mortgages, fringe benefits, pay schedule, budgets, etc.) that you submit to the board for review and approval. Do board members understand their legal responsibility for obligations of your CAA? Is board approval of legal obligations adequately documented in board minutes?</p> | |
| <p>2.4 The board and program directors receive timely and accurate monthly financial statements. Authority Citation of statutory and/or regulatory requirement that must be met. Significance Up-to-date financial information is essential to understanding the current and future well-being of the organization.</p> | <p>Does each program/account have a current, board-approved budget? Does the agency have a master budget? What financial documents are routinely distributed to you and program managers? Describe how those documents are</p> | |

Leadership Team Questions

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|---|---|---|
| <p><input type="checkbox"/> Warning Sign (Check if true) Inaccurate and/or out of date financial information could lead to over- or under-spending of budgets, leading to possible findings of deficiency, noncompliance, funding reduction, or defunding, leaving the organization with obligations it might have to meet from unrestricted funds.</p> | <p>explained? Is financial statements report information less than 30 days old? Does it contain actual to budget, program to date comparisons? Are financial statements presented to the board directly generated from your accounting software? Is the information the board receives supported by such documents? Do you and your staff gain a clear understanding of the organization's financial well-being from the information they receive? Can you and your staff identify possible vulnerability for the organization from the financial information they receive?</p> | |
| <p>2.6 Administrative expenses are distributed on the basis of a board-approved cost allocation plan or an approved indirect cost rate. Authority This is an OMB circulars requirement. Significance A consistent set of criteria or justifications must be used to assign administrative costs to funding sources. <input type="checkbox"/> Warning Sign (Check if true) Failure to have and follow an approved cost allocation plan can lead to adverse audits, program monitoring findings of deficiency or</p> | <p>Explain your method of administrative cost allocation: indirect cost rate or cost allocation plan? How did you justify or support this plan and rate? Has your auditor reviewed and approved your plan? your funders? your board?</p> | |

Leadership Team Questions

| Indicator | What I Should Look For | Evidence from Documents, Interviews, Observations |
|--|--|--|
| <p>noncompliance, reduction or denial of funding, or requirement to repay questioned costs from unrestricted funds.</p> | | |
| <p>2.7 Approved purchasing policies and procedures are consistently followed. Authority This is an OMB circular requirement. Significance Adherence to written, approved purchasing procedures provide internal control in an area of financial management easy to abuse. <input type="checkbox"/> Warning Sign (Check if true) Failure to have and follow an approved purchasing policies and procedures can lead to adverse audits, program monitoring findings of deficiency or noncompliance, reduction or denial of funding, or requirement to repay questioned costs from unrestricted funds.</p> | <p>Describe your purchasing policies and procedures. Have they been approved by the board? When were they last reviewed by the board?</p> | |
| <p>2.8 Reports to funders are submitted accurately and on time. Authority This is a requirement of grants and contracts, as well as OMB circulars. Significance Reports on progress toward program goals and on spending compared with budgets are a major tool for staff, the board, and funders to regularly assess grantee performance. <input type="checkbox"/> Warning Sign (Check if true) Failure to file accurate and timely reports can lead to adverse audits, program monitoring findings of deficiency or noncompliance, reduction or</p> | <p>Are reports consistently filed by reporting deadlines? Are reports approved by the board before they are sent in? Do you have problems producing timely, accurate reports? Describe. Have funders returned any reports for completion or correction? What action have you taken to eliminate timely, accurate reporting problems?</p> | |

Leadership Team Questions

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|---|---|---|
| <p>denial of funding, or requirement to repay questioned costs from unrestricted funds. It is also evidence of lack of management control.</p> | | |
| <p>2.9 Findings, disallowed costs, qualified opinions, and management advisories cited in audit reports and management letters are promptly corrected. Authority An OMB circular requirement. May also appear in grant and contracts conditions. Significance An audit provides the board with an independent, "outside" and professional opinion on the likely accuracy and trustworthiness of the grantee's financial operations. Auditors can focus the board's attention on internal controls that need strengthening. <input type="checkbox"/> Warning Sign (Check if true) Failure to correct such conditions can lead to adverse audits, program monitoring findings of deficiency or noncompliance, reduction or denial of funding, or requirement to repay questioned costs from unrestricted funds. It is also evidence of lack of management control.</p> | <p>How seriously does your board take concerns or issues raised in your annual audit report? Have any financial management concerns been cited in the last three audits? Were any such concerns presented to the board by the auditor? Have any of these concerns come up more than one year? Did the board direct staff to carry out corrective action? Was that corrective action reported to and accepted by the board? Were any employees disciplined because these concerns were raised or because they were not fixed?</p> | |
| <p>2.11 There are no unfunded liabilities. Authority Citation of statutory and/or regulatory requirement that must be met. Significance Such unfunded obligations may shift the asset to liabilities ratio to negative. <input type="checkbox"/> Warning Sign (Check if true) Having to</p> | <p>Are you aware of any obligations your CAA owes to its employees or its creditors that have not been budgeted for? Examples might include: - Bills or other debts that are not being paid</p> | |

Leadership Team Questions

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|--|---|--|
| <p>meet these obligations may place great strain on the agency's cash management and cash reserves. This may result in spending of grant funds for non-allowable purposes, or necessitate obtaining or increasing a line of credit.</p> <p>2.12 Funders have disallowed program costs. Authority Grant awards or contracts. Significance Disallowed costs can not be paid from grant/contract funds or be reimbursed to the funder from unrestricted funds. <input type="checkbox"/> Warning Sign (Check if true) Having to meet these obligations may place great strain on the agency's cash management and cash reserves. This may result in spending of grant funds for non-allowable purposes, or necessitate obtaining or increasing a line of credit.</p> <p>2.13 Bills and expenses are paid within 30 days of receipt or due date. Authority Citation of statutory and/or regulatory requirement that must be met. Significance Timely payment indicates good cash management and provides documentation for prompt reimbursement claims filing. <input type="checkbox"/> Warning Sign (Check if true) Inability to pay obligations timely may indicate cash flow and balance sheet problem—evidence of over-expenditure, non-allowable spending, or use of funds from one program to pay expenses of</p> | <ul style="list-style-type: none"> - Employees' accrued annual leave - Taxes owed that have not been paid on time - Large, long-term mortgages or loans <p>Have any of your funding sources told your CAA that some expenses will not be reimbursed? When? What program(s)? What action did the staff and board take to resolve the situation(s)?</p> <p>How long does it take for your program's bills to be paid? Do you ever hear from vendors that their bills have not been on time?</p> | |

Leadership Team Questions

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|-----------|------------------------|---|
| another. | | |

Summary

Do you regard this as a CAA at financial risk? Justify.

What corrective actions must the CAA take to stabilize its financial management or condition? Describe the resulting condition and what evidence you will accept of proof of achievement of that condition?

Do you recommend strengthening particular financial management practices? List.

Human Resources

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|---|---|---|
| <p>3.1 Grantee complies with all state and federal regulations contained in the state CSBG plan.</p> <p>Authority These are based in federal and state legislation and regulation.</p> <p>Significance Observing these regulations is a requirement for funding.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Failure to meet these requirements can lead to adverse audits, program monitoring findings of deficiency or noncompliance, delayed, reduced or denied funding, or requirement to repay questioned costs from unrestricted funds. It is also evidence of lack of management control.</p> | <p>Are you aware of the compliance assurances that your CAA must give as part of its CSBG funding plan/application?</p> <p>Do you believe that your CAA has complied with all of its legal and regulatory responsibilities?</p> <p>What is the basis for your answer?</p> | |

Leadership Team Questions

| Indicator | What I Should Look For | Evidence from Documents, Interviews, Observations |
|--|--|--|
| <p>3.2 The grantee has a board-approved set of employment policies and procedures. Authority text Significance The terms and conditions of employment must be formally established and approved by the board so that all employees can be treated consistently. <input type="checkbox"/> Warning Sign (Check if true) Inconsistency in the treatment of employees can open the grantee up to grievances and law suits that could undermine its credibility and viability.</p> | <p>When were your employment policies and procedures most recently approved by the board? Have all employees have received training in the employment policies and procedures (signed document in their personnel file). Does each employee have a copy of the employee manual? Have any employment grievances or complaints arisen from misunderstanding of the personnel policies and procedures?</p> | |
| <p>3.3 The employment policies and procedures include a hiring process that is consistently used and documented. Authority text Significance Adherence to written, board-approved hiring processes protects the grantee against accusations of abuse or favoritism in employment. <input type="checkbox"/> Warning Sign (Check if true) Inconsistent employment practices are demoralizing to staff and employment-related legal actions can be costly and divert staff time and energy from delivery of quality services.</p> | <p>Are approved hiring, disciplinary, and termination policies and procedures followed throughout the organization? Are hiring and firing functions performed by an HR employee to ensure consistency throughout the organization? Has the CAA resolved all employment grievances or legal actions?</p> | |
| <p>3.4 All positions have been properly classified as to their salaried or non-salaried status.</p> | <p>Have your positions been classified as salaried or non-salaried. Is the classification contained on each job</p> | |

Leadership Team Questions

| Indicator | What I Should Look For | Evidence from Documents, Interviews, Observations |
|--|--|---|
| <p>Authority The IRS (?? Department of Labor??) has strict regulations about the criteria that determine salaried or non-salaried status.</p> <p>Significance This classification affects what kinds of responsibilities can be assigned to employees, the amount of supervision they receive or exercise, and whether they must be paid overtime.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Significant financial penalties can result from improper job classification, including grantee obligation to pay back wages (particularly overtime), benefits, and related fines. These costs and legal fees would have to be paid out of unrestricted funds.</p> | <p>description?</p> <p>IF NO...Are you aware of the legal importance of classifying jobs as salaried or non-salaried? Explain.</p> <p>Was the classification determination made or reviewed by a qualified HR professional?</p> <p>Do your job postings and advertisements specify whether positions advertised are salaried or non-salaried?</p> | |
| <p>3.5 The board has approved a pay schedule, based on a current wage comparability study.</p> <p>Authority This is an OMB circular requirement.</p> <p>Significance Pay equity should be based on objective data and a well-defined matrix of job classifications and pay ranges. Such a plan provides the rationale for what employees are paid.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Pay decisions not supported by the pay schedule can result in grievances, complaints, legal actions, and financial obligations to the grantee that must be paid out of unrestricted</p> | <p>When was the most recent wage comparability study conducted by or for your CAA?</p> <p>Was the study performed by a qualified human resources professional?</p> <p>Did you create, and did your board approve, a pay schedule based on information from your wage comparability study?</p> <p>Do you have more than one pay schedule or plan (employee plan; union contract; executive director contract)?</p> <p>Are there significant differences between these plans? Have the differences</p> | |

Leadership Team Questions

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|--|--|---|
| <p>funds.</p> <p>3.6 The grantee has a board-approved fringe benefits plan.</p> <p>Authority text</p> <p>Significance Fringe benefits are important incentives to recruiting and retaining employees. Fringe benefits must be offered equally to all employees. Employees under contract (e.g. executive director, those under a union contract) can be offered different benefits.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Failure to maintain fringe benefits (pay for them), or to provide them unequally, could create legal and financial liabilities for the grantee.</p> | <p>affected employee morale?</p> <p>Do you have more than one fringe benefits package or plan (employee plan; union contract; executive director contract)?</p> <p>Are there significant differences between these plans? Have the differences affected employee morale?</p> <p>Has your board approved all benefit plans (minutes). Most recent date of approval.</p> <p>Have you had any fringe-related grievances, complaints, or legal actions?</p> | |
| <p>3.7 Employee performance evaluations are conducted regularly and consistently.</p> <p>Authority text</p> <p>Significance Performance evaluations provide the basis for disciplinary, promotion, reduction in force, and termination decisions. They are an important source of feedback to employees.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Personnel actions unsupported by a history of performance evaluation could be contested by employees, generating legal and financial obligations to the grantee that would have to be paid out of unrestricted funds.</p> | <p>How often is employee performance evaluated?</p> <p>How is the evaluation done? (interview, evaluation form)</p> <p>Is the same evaluation process/instrument used for all employees? If not, explain the differences.</p> <p>What are the disciplinary procedures in your CAA?</p> <p>What are the grievance procedures in your CAA?</p> <p>If you have had a recent contested evaluation or a disciplinary action, describe how that was handled.</p> | |

Leadership Team Questions

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|---|--|---|
| <p>3.8 The grantee benefits from stable management leadership. Authority text Significance Stability in management leadership positions tends toward continuity in grantee operation. <input type="checkbox"/> Warning Sign (Check if true) Changes in management leadership shift leadership attention and energy from program improvement and strategic thinking to training and assimilation of new managers. Frequent changes in leadership (more than one per year or frequent changes in one position) disrupt program management and undermine morale.</p> | <p>Has your CAA experienced significant turnover in recent years? What has been the effect on programs or on the organization as a whole? What steps have been taken to identify and address high turnover?</p> | |
| <p>3.9 The grantee has program and/or individual staff development/training plans. Authority A CSBG contractual requirement??? Significance Regular, planned training builds employee competencies and improves program performance. Regular training indicates the grantee values employees and has a commitment to high program performance. <input type="checkbox"/> Warning Sign (Check if true) Failure to train employees or to upgrade their job skills indicates organizational indifference to employees and limited commitment to service excellence. Low employee and program performance can lead to adverse monitoring</p> | <p>Do your personnel policies provide for individual development or team training? Do employees develop and carry out individual development plans? How do you document education or training provided to, or received by, employees? Do employees provide any feedback on the value of training or education they have received?</p> | |

Leadership Team Questions

| Indicator | What I Should Look For | Evidence from Documents, Interviews, Observations |
|---|------------------------|---|
| <p>results, up to loss of funding and obligations to repay funders.</p> | | |

Summary

Do you regard this as a CAA at risk in its human resources practices? Justify.

What corrective actions must the CAA take to normalize/legalize its human resources practices? Describe the resulting condition and what evidence you will accept of proof of achievement of that condition?

Do you recommend strengthening particular human resources practices? List.

Planning

| Indicator | What I Should Look For | Evidence from Documents, Interviews, Observations |
|---|--|---|
| <p>4.1 Grantee has completed a community assessment within the past three years. Authority A state CSBG requirement (citation) Significance A CAA must understand its community and the populations it serves in order to be responsive to them. It must also understand the resources and network of social service providers in order to assess its most effective role(s) in that network. <input type="checkbox"/> Warning Sign (Check if true) CAAs that do not understand their community will likely be perceived as "outsiders," as duplicating services, as unresponsive to the community. Lack of community understanding will limit the CAA's capacity to leverage resources and to focus its efforts where they can have the greatest benefit.</p> | <p>Describe the most recent community assessment prepared by your CAA. What was your opinion of the quality and usefulness of the community assessment? Was the current community assessment presented to committees and the board? How have you and your staff used the community assessment in developing program plans or funding proposals?</p> | |

Leadership Team Questions

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|--|--|---|
| <p>4.2 The grantee is guided by a strategic plan completed within the last five years.</p> <p>Authority A state CSBG requirement (citation)</p> <p>Significance The approval and use of a strategic plan indicates an organization aware of its priorities and possessing a sense of direction. Strategic plans define the conversation board and staff leadership should be having.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Lack of, or failure to use, a strategic plan indicates the grantee lacks a sense of priorities and is operating reactively and passively. It indicates indifference to the conditions in its community and the needs of the populations it serves.</p> | <p>Describe the most recent strategic plan prepared by your CAA.</p> <p>Was information collected on enough topics to produce a comprehensive picture of the communities your CAA serves?</p> <p>How useful was the information collected for your CAA's and your program(s)' planning process?</p> <p>Was the information analyzed and discussed by a good cross section of staff, board, and community partners?</p> <p>Was the community assessment information valuable to the development of the current strategic plan?</p> <p>Describe how you and your staff have used the strategic plan in development of program plans and funding proposals.</p> | |
| <p>4.3 The grantee has implemented state-defined ROMA practices.</p> <p>Authority PL 105-385, 676(b)(II)(D)(12), State CSBG plan and CAA contracts.</p> <p>Significance The Community Services Block grant requires that states and grantees participate in ROMA or some other performance measurement</p> | <p>How have you incorporated ROMA concepts into CAA planning and management activities?</p> <p>Has the board of directors incorporated ROMA concepts into its planning and monitoring</p> | |

Leadership Team Questions

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|--|--|---|
| <p>system. Use of a performance measurement system also indicates a CAA's commitment to achievement and documentation of the changes it is able to bring about for families and communities.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Failure to participate in ROMA or other measurement system could lead to adverse monitoring reports and possible delay, denial, and termination of funding.</p> <p>4.4 Grantee reports progress on its plans to its board of directors at least semi-annually.</p> <p>Authority text</p> <p>Significance The board of directors can not make informed decisions without accurate and current information about program performance. Reports on that performance need to be frequent and understandable.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Lack of current, accurate program information may lead management and the board to make decisions or commitments they can't follow through on.</p> | <p>activities?</p> <p>Describe your adoption of the WVFACS data collection system.</p> <p>What program progress reports are presented to committees and the board, in what form, and with what frequency?</p> <p>Has information presented in program progress reports increased board members' understanding of program compliance and positive outcomes for participants?</p> <p>Has the board had to reverse decisions or undo commitments because they received information too late?</p> | |

Leadership Team Questions

Summary

Do you regard this as a CAA as weak in implementation of its planning? Justify.

What corrective actions must the CAA take to stabilize its planning practices? Describe the resulting condition and what evidence you will accept of proof of achievement of that condition?

Do you recommend strengthening particular planning practices? List.

Services

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|--|--|---|
| <p>5.1 Monitoring reports from funders verify program compliance. Authority Citation of statutory and/or regulatory requirement that must be met.</p> <p>Significance Reports from funding sources provide board and staff with important feedback about program performance.</p> <p><input type="checkbox"/> Warning Sign (Check if true) A pattern of monitoring reports indicating deficiencies or noncompliance in many programs, or repetition over time of such findings in individual programs, should signal board and management that systems problems need to be attended to.</p> | <p>What monitoring reports has your program(s) received since the last CSBG monitoring (DATE)?</p> <p>Have those reports suggested organizational or program patterns of deficiency or noncompliance?</p> <p>Have these monitoring reports been presented to the board of directors?</p> <p>What actions have been taken to resolve the problems identified by monitoring?</p> | |
| <p>5.2 Participant eligibility, cost allowability, service delivery, and program results have been satisfactorily documented for CSBG-funded activities. Authority Citation of statutory and/or regulatory requirement that must be met.</p> | <p>What steps do you take internally to verify that programs comply with requirements related to:</p> <ul style="list-style-type: none"> - participant eligibility? - Allowable costs? | |

Leadership Team Questions

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|--|---|--|
| <p>Significance CSBG-funded activities carry the same compliance standards as other programs. Those standards are spelled out in grantee contracts.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Failure to comply with CSBG requirements could result in delayed, denied, or terminated funding, as well as decertification as a CSBG-eligible entity.</p> | <p>- Allowable activities?</p> <p>- Program outcomes and results?</p> | |
| <p>5.3 Services are provided in cooperation and collaboration with other community organizations. Authority CSBG CAP Plan requirements. Significance CAAs are expected to "leverage" their resources by working with community partners.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Non-cooperating CAAs may be duplicating services or functions already existing at the expense of addressing another unmet need or condition.</p> | <p>Describe the partnerships your CAA has with other organizations and programs.</p> <p>How many of these partnerships revolve around co-funding of programs?</p> <p>Do you have contracts, letters/ memoranda of understanding, or other documents making those partnerships official?</p> <p>Do you have newspaper or other public media evidence of your collaboration? ask for letters, statements or partners.</p> | |
| <p>5.4 CAA staff participate in community service integration and coordination groups. Authority CSBG plan?. Significance Staff participation in inter-agency coordination is a first step to higher levels of collaboration.</p> <p><input type="checkbox"/> Warning Sign (Check if true) A CAA that does</p> | <p>Do program managers or other staff participate in inter-agency groups at the community, county, or state level?</p> <p>Do you and your staff receive/send minutes or summaries of such meetings?</p> | |

Leadership Team Questions

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|--|--|---|
| not participate in inter-agency groups puts the CAA in isolation in the social services community, limiting its capacity to influence community programs and policies. | Have any of your CAA staff held leadership positions inter-agency groups? Any media coverage of the work or impact of these groups? | |

Summary

Do you regard this as a CAA at programmatic risk? Justify.

What corrective actions must the CAA take to stabilize its programmatic management or condition? Describe the resulting condition and what evidence you will accept of proof of achievement of that condition?

Do you recommend strengthening management practices? List.

Administration

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|---|---|---|
| <p>6.1 Information is rapidly and efficiently communicated throughout the organization. Authority ???.</p> <p>Significance Timely sharing of information maintains employee morale and ensures current awareness of compliance requirements. Two-way communication provides line and program staff with access to CAA leadership.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Employees unaware of current program information may incur disallowable costs or act out of compliance. Employees who feel uninformed and isolated become</p> | <p>Do you use email to distribute material to or to communicate with members of your staff or other employees?</p> <p>Does the CAA's top leadership meet at regular intervals?</p> <p>Do program and/or worksite teams meet at regular intervals?</p> <p>Do teams document their discussions and decisions in minutes or meeting summaries?</p> | |

Leadership Team Questions

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|---|---|---|
| <p>mistrustful and disgruntled, attitudes and feelings they may communicate to people served and to the community. A CAA that does not communicate its mission and activities to its partners and to the community limits its public good will and forfeits opportunities for community support.</p> | <p>Are minutes or meeting summaries communicated throughout the organization? Does the CAA have an internal newsletter or other mechanism for sharing information with all employees? What methods and mechanisms does the CAA use to tell its story to the community?</p> | |
| <p>6.2 The organization has an information technology infrastructure that supports timely and efficient communication, data collection, data analysis, and reporting. Authority GOEO CSBG Manual. Significance Electronic network communication increases contact between employees, facilitates collecting, archiving, and tabulating of participant and program information, and reduces the cost of distributing and sharing information. The GOEO has implemented a comprehensive information management system in which all CSBG grantees are required to participate. <input type="checkbox"/> Warning Sign (Check if true) Poorly implemented or supported electronic information technology can decrease employee productivity and increase employee dissatisfaction. Employees may be highly challenged by computer technology unless assisted with accessible, adequate technical support.</p> | <p>Does the CAA operate one or more computer networks? Are all central office staff networked? Are all satellite offices networked to the central office? In real time? On a dial-up or Internet access basis? Does the CAA have written computer security policies and procedures for financial, client, and administrative data? Does the CAA have and carry out a system of regular data back-up and off site storage? Does the CAA have an on-site system administrator? If not, who provides that service? Does the CAA have a tech support</p> | |

Leadership Team Questions

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|---|--|---|
| <p>6.2 The organization has instituted organization-wide service integration. Authority GOEO CSBG Manual. OCS Information Memorandum #49. CSBG PL 205-185 Significance CAAs should reduce administrative and functional duplication in order to apply the greatest amount of resources to services. Assistance to low-income people should be provided in the context of their entire living situation. <input type="checkbox"/> Warning Sign (Check if true) Resources to assist low-income people and communities are wasted if used to support independent program "silos," duplicated administrative services, multiple staff interacting with families.</p> | <p>specialist on staff? Has the CAA completely implemented the WVFACTS information system? What mechanisms does the CAA use to bring staff from all programs together to streamline services to low-income people? Do central administrative functions support many programs or activities or do programs have similar staff who perform the same functions? Does the CAA have policies and procedures to identify and resolve conflicts between programs or departments? Describe how you have encouraged, supported, required administrative and service integration.</p> | |
| <p>6.3 The organization has no pending legal action. Authority GOEO CSBG Manual. Significance Legal actions may drain CAA reserves of unrestricted funds. They occupy the time and attention of administrators. <input type="checkbox"/> Warning Sign (Check if true) Legal actions indicate that the CAA has not conducted its activities</p> | <p>Does the CAA have any unresolved - employment grievances - complaints - lawsuits Have you identified any patterns to grievances, complaints, or lawsuits that indicate systemic</p> | |

Leadership Team Questions

| Indicator | What I Should Look For | Evidence from Documents, Interviews, Observations |
|--|-------------------------------|--|
| consistently with its policies and procedures or with laws and regulations. They also suggest that the CAA lacks adequate internal controls to identify and correct improper or inappropriate activities. Successful legal actions may impose monetary obligations the CAA can not meet. | weaknesses to be addressed. | |

Summary

Do you regard this as a CAA at administrative risk? Justify.

What corrective actions must the CAA take to stabilize its administrative management or condition? Describe the resulting condition(s) and what evidence you will accept as proof such condition(s) have been achieved

What administrative practices do you recommend that the CAA strengthen? List.

Program Staff Questions

Financial Management and Condition

| Indicator | What I Should Look For | Evidence from Documents, Interviews, Observations |
|--|---|---|
| <p>2.7 Approved purchasing policies and procedures are consistently followed. Authority This is an OMB circular requirement. Significance Adherence to written, approved purchasing procedures provide internal control in an area of financial management easy to abuse. <input type="checkbox"/> Warning Sign (Check if true) Failure to have and follow an approved purchasing policies and procedures can lead to adverse audits, program monitoring findings of deficiency or noncompliance, reduction or denial of funding, or requirement to repay questioned costs from unrestricted funds.</p> | <p>Describe your CAA's purchasing policies and procedures, especially the ones you use the most. Does your CAA use a purchase order system? If so, describe it. When does your CAA require that purchases be done through bids?</p> | |
| <p>2.9 Findings, disallowed costs, qualified opinions, and management advisories cited in audit reports and management letters are promptly corrected. Authority An OMB circular requirement. May also appear in grant and contracts conditions. Significance An audit provides the board with an independent, "outside" and professional opinion on the likely accuracy and trustworthiness of the grantee's financial operations. Auditors can focus the board's attention on internal controls that need strengthening.</p> | <p>Have the last three audits disallowed any costs in your program? Explain. Have any of these disallowed costs come up in more than one year? What was done to correct the costs that were disallowed?</p> | |

Program Staff Questions

| Indicator | What I Should Look For | Evidence from Documents, Interviews, Observations |
|---|---|---|
| <p><input type="checkbox"/> Warning Sign (Check if true) Failure to correct such conditions can lead to adverse audits, program monitoring findings of deficiency or noncompliance, reduction or denial of funding, or requirement to repay questioned costs from unrestricted funds. It is also evidence of lack of management control.</p> <p>2.10 Property and equipment inventories are less than two years old.</p> <p>Authority This is an OMB circular requirement. It may also be a grant/contract condition.</p> <p>Significance Such records are important to document insurance or damage claims, as well as acquisition or disposition and possible "ownership interest" in contract purchased property.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Failure to maintain compliant, timely inventory records can lead to adverse audits, program monitoring findings of deficiency or noncompliance, reduction or denial of funding, or requirement to repay questioned costs from unrestricted funds. It is also evidence of lack of management control.</p> | <p>Is any property you use in your work recorded on an inventory by this agency?</p> <p>What do you have to do to place an item on an inventory?</p> <p>What do you have to do to remove an item from an inventory?</p> <p>How are inventoried items marked or identified with inventory codes?</p> | |

Program Staff Questions

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|---|--|--|
| <p>2.13 Bills and expenses are paid within 30 days of receipt or due date.</p> <p>Authority Citation of statutory and/or regulatory requirement that must be met.</p> <p>Significance Timely payment indicates good cash management and provides documentation for prompt reimbursement claims filing.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Inability to pay obligations timely may indicate cash flow and balance sheet problem—evidence of over-expenditure, non-allowable spending, or use of funds from one program to pay expenses of another.</p> | <p>Are you aware of any vendors asking or complaining about later payment of their invoices?</p> | |

Summary

Do you regard this as a CAA at program financial risk? Justify.

What corrective actions must the CAA take to stabilize its program financial management or condition? Describe the resulting condition and what evidence you will accept of proof of achievement of that condition?

Do you recommend strengthening particular financial management practices? List.

Program Staff Questions

Human Resources

| Indicator | What I Should Look For | Evidence from Documents, Interviews, Observations |
|--|--|---|
| <p>3.2 The grantee has a board-approved set of employment policies and procedures. Authority text Significance The terms and conditions of employment must be formally established and approved by the board so that all employees can be treated consistently. <input type="checkbox"/> Warning Sign (Check if true) Inconsistency in the treatment of employees can open the grantee up to grievances and law suits that could undermine its credibility and viability.</p> | <p>Does your CAA have an employee manual containing personnel policies and procedures? Do you have a copy of that manual? Do you have easy access to one? Have you received any training on your CAA's personnel policies and procedures? When was that training? Do you know of any employment grievances or complaints that resulted from misunderstanding of the personnel policies and procedures?</p> | |
| <p>3.3 The employment policies and procedures include a hiring process that is consistently used and documented. Authority text Significance Adherence to written, board-approved hiring processes protects the grantee against accusations of abuse or favoritism in employment. <input type="checkbox"/> Warning Sign (Check if true) Inconsistent employment practices demoralize staff. Employment-related legal actions can be costly and divert staff time and energy from delivery of quality services.</p> | <p>Describe the process you went through when you were hired by your CAA. Describe the process you went through when you got your current job, if this is not your first job at the CAA. Is the same process used for all employee hiring?</p> | |

Program Staff Questions

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|---|--|---|
| <p>3.4 All positions have been properly classified as to their salaried or non-salaried status.</p> <p>Authority The IRS (?? Department of Labor??) has strict regulations about the criteria that determine salaried or non-salaried status.</p> <p>Significance This classification affects what kinds of responsibilities can be assigned to employees, the amount of supervision they receive or exercise, and whether they must be paid overtime.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Significant financial penalties can result from improper job classification, including grantee obligation to pay back wages (particularly overtime), benefits, and related fines. These costs and legal fees would have to be paid out of unrestricted funds.</p> | <p>Is your job a salaried or non-salaried position?</p> <p>Does it say that on your job description?</p> <p>Do you know why your job has been classified that way?</p> <p>IF NO...Are you aware of the legal importance of classifying jobs as salaried or non-salaried? Explain.</p> | |
| <p>3.5 The board has approved a pay schedule, based on a current wage comparability study.</p> | <p>Describe how the rate of pay for your position was determined?</p> <p>Are other employees in the same position paid the same rate (not including additions for cost of living, years of service, etc.)?</p> <p>Do you think you job pays as well as similar jobs at other employers in your community? Can you name similar jobs that pay better?</p> | |

Program Staff Questions

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|---|--|--|
| <p>3.6 The grantee has a board-approved fringe benefits plan. Authority text Significance Fringe benefits are important incentives to recruiting and retaining employees. Fringe benefits must be offered equally to all employees. Employees under contract (e.g. executive director, those under a union contract) can be offered different benefits. <input type="checkbox"/> Warning Sign (Check if true) Failure to maintain fringe benefits (pay for them), or to provide them unequally, could create legal and financial liabilities for the grantee.</p> | <p>What are the fringe benefits that you receive? Do all employees receive the same fringe benefits? Does your CAA have more than one fringe benefits plan? Are there significant differences between these plans? Have the differences affected employee morale?</p> | |
| <p>3.7 Employee performance evaluations are conducted regularly and consistently. Authority text Significance Performance evaluations provide the basis for disciplinary, promotion, reduction in force, and termination decisions. They are an important source of feedback to employees. <input type="checkbox"/> Warning Sign (Check if true) Personnel actions unsupported by a history of performance evaluation could be contested by employees, generating legal and financial obligations to the grantee that would have to be paid out of unrestricted funds.</p> | <p>Does your supervisor evaluate your job performance? How often? How is the evaluation done? (interview, evaluation form) Do you know what the disciplinary procedures are in your CAA? If you have ever been disciplined by your supervisor, describe how that was done. Do you know what the grievance procedures are in your CAA? If you have contested an evaluation or a disciplinary action, describe how you did that and how it was handled.</p> | |

Program Staff Questions

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|--|--|---|
| <p>3.8 The grantee benefits from stable management leadership. Authority text Significance Stability in management leadership positions tends toward continuity in grantee operation. <input type="checkbox"/> Warning Sign (Check if true) Changes in management leadership shift leadership attention and energy from program improvement and strategic thinking to training and assimilation of new managers. Frequent changes in leadership (more than one per year or frequent changes in one position) disrupt program management and undermine morale.</p> | <p>Has there been turnover on your work team? What was the effect? Have you had more than one supervisor in the last year? What was the effect? Has your program had more than one director/manager in the last three years? What was the effect?</p> | |
| <p>3.9 The grantee has program and/or individual staff development/training plans. Authority A CSBG contractual requirement??? Significance Regular, planned training builds employee competencies and improves program performance. Regular training indicates the grantee values employees and has a commitment to high program performance. <input type="checkbox"/> Warning Sign (Check if true) Failure to train employees or to upgrade their job skills indicates organizational indifference to employees and limited commitment to service</p> | <p>Does your agency have a policy of providing ways for employees to get additional training or education? Does your CAA (program) pay for you to obtain training or education? What training or education have you obtained in the last year? Did you provide any feedback on the value of the training or education received?</p> | |

Program Staff Questions

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|---|------------------------|---|
| <p>excellence. Low employee and program performance can lead to adverse monitoring results, up to loss of funding and obligations to repay funders.</p> | | |

Summary

Do you regard this as a CAA at risk in its human resources practices? Justify.

What corrective actions must the CAA take to normalize its human resources practices? Describe the resulting condition and what evidence you will accept of proof of achievement of that condition?

Do you recommend strengthening particular human resources practices? List.

Planning

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|--|---|---|
| <p>4.1 Grantee has completed a community assessment within the past three years. Authority A state CSBG requirement (citation) Significance A CAA must understand its community and the populations it serves in order to be responsive to them. It must also understand the resources and network of social service providers in order to assess its most effective role(s) in that network. <input type="checkbox"/> Warning Sign (Check if true) CAAs that do not understand their community will likely</p> | <p>Do you know about a study of your community and the people you serve that has taken place in your CAA in the last three years? Tell me about that study? How was it carried out? Did you participate? What was done with the information that was collected?</p> | |

CAA _____ Date _____

Monitor _____

Program Staff Questions

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|--|--|---|
| <p>be perceived as "outsiders," as duplicating services, as unresponsive to the community. Lack of community understanding will limit the CAA's capacity to leverage resources and to focus its efforts where they can have the greatest benefit.</p> | | |
| <p>4.2 The grantee is guided by a strategic plan completed within the last five years. Authority A state CSBG requirement (citation) Significance The approval and use of a strategic plan indicates an organization aware of its priorities and possessing a sense of direction. Strategic plans define the conversation board and staff leadership should be having. <input type="checkbox"/> Warning Sign (Check if true) Lack of, or failure to use, a strategic plan indicates the grantee lacks a sense of priorities and is operating reactively and passively. It indicates indifference to the conditions in its community and the needs of the populations it serves.</p> | <p>Does your CAA have a strategic plan? When was it created? Were you involved in putting it together? Does your supervisor talk about how the work you do connects to the strategic plan? Do you have a copy of the strategic plan? Do you think the work you do appears in the strategic plan?</p> | |
| <p>4.3 The grantee has implemented state-defined ROMA practices. Authority PL 105-385, 676(b)(II)(D)(12), State CSBG plan and CAA contracts. Significance The Community Services Block grant requires that states and grantees</p> | <p>Describe what you know about the WVFACS data collection system? Tell me what you know about the national goals and performance indicators, also known as ROMA. Does your CAA measure the results of</p> | |

Program Staff Questions

Summary

Do you regard this as a CAA as weak in implementation of its strategic thinking? Justify.

What corrective actions must the CAA take to stabilize its strategic thinking? Describe the resulting condition and what evidence you will accept of proof of achievement of that condition?

Do you recommend strengthening particular strategic thinking practices? List.

Services

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|--|--|--|
| <p>5.1 Monitoring reports from funders verify program compliance. Authority Citation of statutory and/or regulatory requirement that must be met. Significance Reports from funding sources provide board and staff with important feedback about program performance. <input type="checkbox"/> Warning Sign (Check if true) A pattern of monitoring reports indicating deficiencies or noncompliance in many programs, or repetition over time of such findings in individual programs, should signal board and management that systems problems need to be attended to.</p> | <p>Does the agency or organization that funds your program come and monitor (or inspect) your work to make sure you are doing it correctly? If so, when was the last time that happened? Did the program monitors find anything about your program that you should fix or make better? How did you find out about that? What did you do to fix or correct those findings?</p> | |
| <p>5.2 Participant eligibility, cost allowability, service delivery, and program results have been satisfactorily</p> | <p>Tell me what makes a person eligible for the program(s) that you work in. What do you do to make sure they are</p> | |

Program Staff Questions

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|--|---|---|
| <p>documented for CSBG-funded activities. Authority Citation of statutory and/or regulatory requirement that must be met. Significance CSBG-funded activities carry the same compliance standards as other programs. Those standards are spelled out in grantee contracts. <input type="checkbox"/> Warning Sign (Check if true) Failure to comply with CSBG requirements could result in delayed, denied, or terminated funding, as well as decertification as a CSBG-eligible entity.</p> | <p>eligible (income verification, etc.)? How do you document that someone is eligible? What do you do to track what participants in your program do? How do you track how participants in your program have changed (for the better, hopefully) as a result of being in the program?</p> | |
| <p>5.3 Services are provided in cooperation and collaboration with other community organizations. Authority CSBG CAP Plan requirements. Significance CAAs are expected to "leverage" their resources by working with community partners. <input type="checkbox"/> Warning Sign (Check if true) Non-cooperating CAAs may be duplicating services or functions already existing at the expense of addressing another unmet need or condition.</p> | <p>Tell me about other organizations in your community that you work with to help the people you serve? Does your CAA have agreements or contracts with other organizations to provide services together or to provide services to your families?</p> | |
| <p>5.4 CAA staff participate in community service integration and coordination groups. Authority CSBG plan? Significance Staff participation in inter-</p> | <p>Do any multi-agency groups in your community meet regularly to understand each other's services and programs? Do you, or anyone from your team or office, participate in any multi-agency</p> | |

CAA _____ Date _____

Monitor _____

Program Staff Questions

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|--|---|---|
| <p>agency coordination is a first step to higher levels of collaboration.</p> <p><input type="checkbox"/> Warning Sign (Check if true) A CAA that does not participate in inter-agency groups puts the CAA in isolation in the social services community, limiting its capacity to influence community programs and policies.</p> | <p>groups to understand each other's services and programs?</p> <p>How does being part of such groups affect your work?</p> | |

Summary

Do you regard this as a CAA at programmatic risk? Justify.

What corrective actions must the CAA take to stabilize its programmatic management or condition? Describe the resulting condition and what evidence you will accept of proof of achievement of that condition?

Do you recommend strengthening particular program management practices? List.

Administration

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|---|---|---|
| <p>6.1 Information is rapidly and efficiently communicated throughout the organization. Authority ???.</p> <p>Significance Timely sharing of information maintains employee morale and ensures current awareness of compliance requirements. Two-way communication provides line and program staff with access to CAA leadership.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Employees unaware</p> | <p>Does the CAA's top leadership meet at regular intervals?</p> <p>Do program and/or worksite teams meet at regular intervals?</p> <p>Do teams document their discussions and decisions in minutes or meeting summaries?</p> <p>Do you receive minutes or</p> | |

CAA _____ Date _____

Monitor _____

Program Staff Questions

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|--|--|---|
| <p>of current program information may incur disallowable costs or act out of compliance. Employees who feel uninformed and isolated become mistrustful and disgruntled, attitudes and feelings they may communicate to people served and to the community. A CAA that does not communicate its mission and activities to its partners and to the community limits its public good will and forfeits opportunities for community support.</p> | <p>summaries of program or leadership teams? Does the CAA have an internal newsletter or other mechanism for sharing information with all employees? What methods and mechanisms does the CAA use to tell its story to the community?</p> | |
| <p>6.2 The organization has an information technology infrastructure that supports timely and efficient communication, data collection, data analysis, and reporting. Authority GOEO CSBG Manual. Significance Electronic network communication increases contact between employees, facilitates collecting, archiving, and tabulating of participant and program information, and reduces the cost of distributing and sharing information. The GOEO has implemented a comprehensive information management system in which all CSBG grantees are required to participate. <input type="checkbox"/> Warning Sign (Check if true) Poorly implemented or supported electronic information technology can decrease employee productivity and increase employee dissatisfaction. Employees may be highly challenged by computer technology unless assisted with accessible, adequate technical support.</p> | <p>Does the CAA operate one or more computer networks? Are all central office staff networked? Are all satellite offices networked to the central office? In real time? On a dial-up or Internet access basis? Can you use email to communicate with your team members, supervisor, or other employees? Do you? Does the CAA have written computer security policies and procedures for financial, client, and administrative data? Does the CAA have and carry out a system of regular data back-up and off site storage?</p> | |

Program Staff Questions

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|---|---|---|
| <p>6.3 The organization has instituted organization-wide service integration. Authority GOEO CSBG Manual. OCS Information Memorandum #49. CSBG PL 205-185</p> <p>Significance CAAs should reduce administrative and functional duplication in order to apply the greatest amount of resources to services. Assistance to low-income people should be provided in the context of their entire living situation.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Resources to assist low-income people and communities are wasted if used to support independent program "silos," duplicated administrative services, multiple staff interacting with families.</p> | <p>Does the CAA have an on-site system administrator? If not, who provides that service?</p> <p>Does the CAA have a tech support specialist on staff?</p> <p>Has the CAA completely implemented the WVFACS information system?</p> <p>What mechanisms does the CAA use to bring staff from all programs together to streamline services to low-income people?</p> <p>Do central administrative functions support many programs or activities or do programs have similar staff who perform the same functions?</p> <p>Does your CAA have a "centralized intake" system to reduce the number of times a family must provide information to become eligible for services?</p> | |
| <p>6.4 The organization has no pending legal action. Authority GOEO CSBG Manual.</p> <p>Significance Legal actions may drain CAA reserves of unrestricted funds. They occupy the time and</p> | <p>Are you aware of whether your CAA has any unresolved</p> <ul style="list-style-type: none"> - employment grievances - complaints | |

Program Staff Questions

| Indicator | What I should Look For | Evidence from Documents, Interviews, Observations |
|---|--|---|
| <p>attention of administrators.</p> <p><input type="checkbox"/> Warning Sign (Check if true) Legal actions indicate that the CAA has not conducted its activities consistently with its policies and procedures or with laws and regulations. They also suggest that the CAA lacks adequate internal controls to identify and correct improper or inappropriate activities. Successful legal actions may impose monetary obligations the CAA can not meet.</p> | <p>- lawsuits</p> <p>Do you think there are patterns to grievances, complaints, or lawsuits that indicate organizational weaknesses that need to be fixed?</p> | |

Summary

Do you regard this as a CAA at administrative risk? Justify.

What corrective actions must the CAA take to stabilize its administrative management or condition? Describe the resulting condition(s) and what evidence you will accept as proof such condition(s) have been achieved

What administrative practices do you recommend that the CAA strengthen? List.

Attachment 4
GOEO Discretionary Grants
2005 - 2007

COMMUNITY SERVICES BLOCK GRANT (CSBG) ~ DISCRETIONARY

| Program Year 2005 | | |
|-------------------------------|-------------|--|
| Agency: | Amt. | Use of Funds - Technical Assistance/Training/Agency Capacity |
| CENTRAL | \$23,000.00 | Furnace Repair, Safety HS |
| CHANGE | \$15,000.00 | Peachtree Acctg Nonprofit |
| CASE | \$63,000.00 | Computer Tech Train Program |
| CRI, INC | \$46,339.00 | MICA Crisis Intervention, Board Training - Pam Pullman |
| COUNCIL | \$31,800.00 | WV/FACS Pro Asst Software, HS Program Assist., Grant Writer Seed Funds |
| MINGO | \$970.00 | Back File Data Entry |
| MT. CAP | \$15,000.00 | Child Dev Center Upshur Co |
| NICHOLAS | \$375.00 | Technical Assistance Back File Data Entry |
| NORTH CENTRAL | \$25,465.00 | Technical Assistance, Back File Data Entry, Financial Crisis |
| RALEIGH | \$9,292.00 | Pre-Head Start PRISM Review |
| SOUTHWESTERN | \$15,000.00 | Empl. Program Collab. |
| TELAMON | \$35,000.00 | Cash Flow Assist./Financial Crisis |
| WV/CAP | \$57,212.00 | Technical Assistance, ROMA Implementation, WV/CAP Educational Conference |
| ROMA/HS Meeting | \$1,800.00 | HS/ROMA Meeting |
| Program Year 2006 | | |
| Agency | Amt. | Use of Funds - Technical Assistance/Training/Agency Capacity |
| CENTRAL | \$4,740.00 | Board of Directors Training, P. Pullman / Back File Data Entry |
| CHANGE | \$25,000.00 | Family Medical Center - FQHC |
| CASE | \$1,381.00 | Technical Assistance ROMA Implementation Task Force |
| CRI, INC | \$10,143.00 | MICA Monitoring Contract for work began 2005/Acctg Software |
| COUNCIL | \$15,000.00 | Disadvantage Persons Program |
| EASTERN | \$22,960.00 | Charitable Leveraging Pilot Program |
| MT. CAP | \$30,000.00 | Community Fitness Center/Group Work Camp |
| RALEIGH | \$2,750.00 | Board of Directors Training, P. Pullman |
| SOUTHWESTERN | \$30,000.00 | Technical Assistance/ IDA Pilot Project |
| TELAMON | \$9,145.00 | Enhance grant receipt from other agency |
| WV Bureau Children & Families | \$1,421.00 | Program Support |
| ALL CAA'S | \$50,000.00 | DBA WV FACS Pro |
| UKA dba Capital Resource | \$12,495.00 | Expenses |
| WV/CAP | \$47,018.00 | WV/CAP Educ Conf/Transfer DBA FACS Pro Support Agreement |
| Program Year 2007 | | |
| Agency | Amount | Use of Funds - Technical Assistance/Training/Agency Capacity |
| CHANGE | \$25,000.00 | Family Medical Center - FQHC |
| EASTERN | \$35,000.00 | WV Resource Development Program |
| MT. CAP | \$13,876.00 | Technical Assistance - Technology |
| RALEIGH | \$15,000.00 | Community Planner/Developer |
| TELAMON | \$7,350.00 | Copier equipment purchase |
| ALL CAA'S | \$55,488.00 | DBA WV FACS Pro |
| WV BC&F | \$13,579.00 | Program Assistance |
| WV/CAP | \$10,000.00 | WV/CAP Education Conference |

Attachment 5

ROMA – History, Purpose and Perspective

History, Purpose, and Perspective

Learning Objective: Review historical milestones to introduce the mission of Community Action, which provides the context for ROMA implementation.

1964 – The Beginning

Congress passes the Economic Opportunity Act establishing and funding Community Action Agencies and Programs.

1970 – The Mission and the Model

Issuance of OEO Instruction 6320-1 establishes the mission and the model (family, agency and community) of Community Action:

“To stimulate a better focusing of all available, local, state, private, and Federal resources upon the goal of enabling low-income families, and low-income individuals of all ages in rural and urban areas, to attain the skills, knowledge, and motivations and secure the opportunities needed for them to become self-sufficient.” Family

“The Act thus gives the CAA a primarily catalytic mission: to make the entire community more responsive to the needs and interests of the poor by mobilizing resources and bringing about greater institutional sensitivity. A CAA's effectiveness, therefore, is measured not only by the services which it directly provides but, more importantly, by the improvements and changes it achieves in the community's attitudes and practices toward the poor and in the allocation and focusing of public and private resources for antipoverty purposes.” Community

“In developing its strategy and plans, the CAA shall take into account the area of greatest community need, the availability of resources, and its own strengths and limitations. It should establish realistic, attainable objectives, consistent with the basic mission established in this Instruction, and expressed in concrete terms which permit the measurement of results. Given the size of the poverty problem and its own limited resources, the CAA should concentrate its efforts on one or two major objectives where it can have the greatest impact.” Agency

Go to Appendix One: OEO Instruction 6320-1, November 16, 1970, Donald Rumsfeld, Director.

History, Purpose, and Perspective

1981 – The Block Grant

Enactment of the Community Services Block Grant changes the regulatory and funding basis of Community Action Agencies.

1993 – Measurement and Accountability

Congress passes the Government Performance and Results Act (GPRA). “The purposes of this Act are to – improve Federal program effectiveness and public accountability by promoting a new focus on results, service quality, and customer satisfaction – help Federal managers improve service delivery, by requiring that they plan for meeting program objectives and by providing them with information about program results and service quality.”

- Establish performance goals to define the level of performance to be achieved by a program activity.
- Express such goals in an objective, quantifiable, and measurable form.
- Describe the operational processes, skills, technology, and the human capital, information, or other resources required to meet the performance goals.
- Establish performance indicators to be used in measuring or assessing the relevant outputs, service levels and outcomes of each program activity.
- Provide a basis for comparing the actual program results with the established performance goals.
- Describe the means to be used to verify and validate measured values.

Go to Appendix Two: Government Performance and Results Act of 1993, (b) Performance Plans and Reports, Section 1115. Performance Plans.

History, Purpose, and Perspective

1994 – Six National Goals

The CSBG Monitoring and Assessment Task Force supported by the Administration for Children and Families, Office of Community Services (OCS), and the U.S. Department of Health and Human Services produced a National Strategic Plan that identified six national goals for community action.

- Goal 1.** Low-income people become more self-sufficient.
(Family)
- Goal 2.** The conditions in which low-income people live are improved. **(Community)**
- Goal 3.** Low-income people own a stake in their community.
(Community)
- Goal 4.** Partnerships among supporters and providers of services to low-income people are achieved.
(Agency)
- Goal 5.** Agencies increase their capacity to achieve results.
(Agency)
- Goal 6.** Low-income people, especially vulnerable populations, achieve their potential by strengthening family and other supportive systems. **(Family)**

History, Purpose, and Perspective

1998 – ROMA

ROMA is a sound management practice that incorporates the use of outcomes or results into the administration, management, and operation of human services. CAAs must focus on the outcome—the result or the product—in addition to the services and activities of the program.

In response to GPRA and the recognition by OCS that the CAAs could benefit from developing their own management and accountability practices, the CSBG Act was amended to mandate implementation of a comprehensive performance-based management system across the entire Community Services Network. This system, named “Results-Oriented Management and Accountability,” or ROMA, required reporting from all CAAs and CSBG funded agencies beginning October 1, 2001.

State government and the CAAs have significant discretion and flexibility in their programming. Successful ROMA implementation must accommodate these differences while supporting national measures.

In the ROMA model, data is collected to develop a body of information used by CAA managers to support their on-going management of the agency. ROMA focuses on the outcomes resulting from agency activities in addition to the traditional counting of clients and units of service. Budget is linked to outcomes in addition to expenditure and service data.

History, Purpose, and Perspective

2001 – Focus on Client and Community

The Office of Community Services issues Information Memo 49 –Program Challenges, Responsibilities and Strategies – FY 2001-2003. *The six national ROMA goals reflect a number of important concepts that transcend CSBG as a stand-alone program.* The goals convey the unique strengths that the broader concept of Community Action brings to the Nation's anti-poverty efforts.

1. Focusing our efforts on client/community/organizational change, not particular programs or services. As such, the goals provide a basis for results-oriented, not process-based or program-specific plans, activities, and reports.

CAAs are client and not program based delivery systems; the effectiveness of Community Action is measured by the positive impact on the client resulting from participation in all programs of the CAA; CAAs work to improve their community as well as their internal management processes.

2. Understanding the interdependence of clients, communities, and programs. The (six national) goals recognize that client improvements aggregate to, and reinforce, community improvements, and that strong and well-administered programs underpin both.

Emphasizes the interdependence of the family, agency and community model whose effectiveness depends on sound agency management.

3. Recognizing that CSBG does not succeed as an individual program. The (six national) goals presume that Community Action is most successful when activities supported by a number of funding sources are organized around client and community outcomes, both within an agency and with other service providers.

Establishes that CSBG is part of the CAA and not an individual program, that CAAs work best in partnership and collaboration with other community based organizations, that CSBG funds are used to leverage other agency and community resources, and that all activities and outcomes of a CAA whether funded by CSBG or other sources are reportable.

Go to Appendix Three: CSBG Program Information Memorandum Transmittal No. 49, February 21, 2001.

History, Purpose, and Perspective

2005 – Implementation of National Indicators of Community Action Performance

The Office of Community Services (OCS) participated in a Program Assessment and Rating Tool (PART) review administered by the Office of Management and Budget (OMB), which raised several questions regarding the implementation and reporting of ROMA data across the country.

PART questioned, especially, the way individual states/eligible entities had established performance goals and performance indicators. It was suggested that a national system be adopted to standardize this information for everyone.

Further information about the PART review process including performance data and a detailed review of CSBG can be found at:
<http://www.whitehouse.gov/omb/budget/fy2005/part.html>

In response to OMB and its issuance of PART, OCS has moved to institute the first mandatory reporting for 2005.

Implementation of National Indicators of Community Action Performance

Twelve (12) national performance indicators were created collaboratively within the Community Services Network to enable approximately 1,000 diverse community action agencies in 52 states and territories to present a more uniform and coherent national picture of their work and accomplishments.

Reporting of national performance indicators is an important component of the broader community action initiative to use results-focused management principles to revitalize and strengthen the entire Community Services Network.

The 12 National Performance Indicators are about Community Action, not just the Community Services Block Grant. Outcomes should be counted and reported from all relevant community action programs and activities.

Agencies should report outcomes only for those National Performance Indicators for which they have supporting programs and activities.

The 12 National Performance Indicators reflect only a portion of the work and accomplishments of Community Action. This is not our complete story, but a selective sampling of what we do.

Community Action Agencies should continue to report annually on their full range of ROMA outcomes in addition to reporting on the 12 national indicators. *

* It is important to note that each National Indicator is followed by sub indicators. There are actually 76 indicators and sub indicators which are a part of the accountability system for 2005. A list of all the National Performance Indicators can be found in Appendix 4

Efforts like those of PA FACS Report (see Appendix 5) and the work of the Monitoring and Assessment Task Force (MATF) formed the basis of the National Indicators of Performance for Community Action.

Attachment 6

WV ROMA Implementation Task Force



WV ROMA Task Force Meeting Minutes

June 27, 2007 ▪ Flatwoods, WV
9:00 AM

| | |
|------------------------------|---|
| ATTENDANCE | Lisa June, CHANGE; Bonnie Samu, NCWVCAA; Sandy Graham, CASE; Patricia Coan, EWVCAA, Tammy Byers, CASE; Joe Hancock, NCAP; Judy Huntermark, EWVCAA; Lesa Thomas, GOEO; Teresa Shepard, CRI; Caron Burgess, PRIDE; Roni Kazee, PRIDE; Michelle Royce, NCWVCAA; Kara Heslen, Telamon; Heather Eldridge, COSM; Butch Hatfield, CRA; Heather Osborne, MTNHEART; Randal Johnson, CSM; Michelle Hill, MCAP; Janice Brinager, MCAP; Delores Stanley, MCAP; Mary Chipps, WVCAP; Melanie Pagliaro, CRI; Andy Austin, RCCAA; Bobbi Thomas-Bailey, RCCAA; Deborah Sims, SCAC; Dwight Coburn, SCAC; Carol Edds, RCCAA; Sharon Meadows, RCCAA; Debbie Wilfong, MTNCAP; Jackie Rader, MTNCAP |
| | |
| AGENDA TOPIC | Approve Minutes |
| DISCUSSION | Motion to Accept by Judy Huntermark Second by Sandy Graham Motion Passed – All Yea |
| ACTION ITEMS | |
| PERSON(S) RESPONSIBLE | |
| DEADLINE | |
| | |
| AGENDA TOPIC | Committee Reports |
| DISCUSSION | <p>Strategic Planning Committee – Chair Melanie Pagliaro Very good and honest discussion; Three areas to work on – Positioning, Training & Support, Resourcing; 10 agencies represented; developed goals and objectives under each area. The next step will be to develop action steps for those goals and objectives. Tricia Kingery was the consultant for the meeting. Thanks to the WVCAP Directors Association for paying for her time. Tricia will be taking the information and compiling a plan, review the Mission Plan, and help the TF to determine a strategic plan, as well as the roles of the TF members, EDs and GOEO. Suggestion that existing committees roll up into the three main areas.</p> <p>Outcomes Catalog Committee – Chair Sandy Graham Went through the earlier catalogs with more experienced eyes than when they were developed. Found quite a few indicators and outcomes that could be deleted, or were not measuring anything. Need to meet with Lesa Thomas to go over proposed changes to ensure that no agency is using that outcome and/or indicator. Will develop the draft of the new catalog for next meeting. TF will then be able to review and discuss it.</p> |

Bonnie Samu suggested that they make the corrections in red so that all can see the proposed changes, instead of having to flip between multiple catalogs. Committee agreed.

Lesa Thomas explained that the Outcomes Catalog review and edit is not only for easier IS Reporting, but to ensure that our WV Indicators link to a National Indicator, and to enable agencies to add something simple to their program and therefore create an indicator that National's wants and cares about. For example, budget counseling is not something Nationals cares about, but adding a follow-up component to the program can now fall under maintained a budget for 90 days, which is important to Nationals.

Family Development Committee – Chair Bonnie Samu

Teresa Shepard chaired the meeting since Bonnie Samu was attending the Strategic Planning Meeting. Six TF members attended. Discussed the five tier process developed during the last TF meeting. Discussed different types of intake processes, such as phone, in person, and paper. Discussed the holistic approach this is based on, and the philosophy behind it.

Discussed who would make a good Family Development person, and came up with a number of characteristics, such as being creative, knowing the agency, knowing the referral system and referral agencies, seeing the big picture, being honest, being a good listener, being able to remain confidential, being thorough, following procedures and protocol, being detail oriented, being a good communicator, being empathic but not gullible, having ROMA and FACS training.

Want to offer a training before Jack Green comes in to create the correct thought process, and determine the correct person to send to the Family Development Training. Looking at the end of July. Location TBA. Casey Davison has agreed to poll agencies to see who is interested.

Copy of the report will be sent out to TF members.

Lesa Thomas explained that this will also enable the TF to develop the appropriate outcomes and tasks required, and more importantly that all agencies are completing them with acceptable measures, such as income verification. Want to develop this model before Jack Green comes in so that the program can be implemented by agencies wanting a Family Development program.

Vickie Geary asked who Jack Green was. Lesa Thomas explained that he was certified in the Family Development module, and was able to train on it.

Mentoring Committee – Chair Butch Hatfield

Came up with a basic framework and structure for the Mentoring program. However, after the Strategic Planning meeting, may need to revise it. Developing a survey to send out to TF members to determine how everyone views this mentor program, and each members strengths. In order to build on strengths, have to first find them. Hope to have

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| | <p>the survey out by next week.</p> <p>Idea for mentoring program developed from questions that came about and not knowing where to go to get the answer. Want to develop a framework of who to call for certain situations based on TF members strengths.</p> |
| ACTION ITEMS | <p>Outcomes Catalog – Develop draft of the new catalog for next meeting.</p> <p>Family Development Committee - Casey Davison will poll agencies about interest in training.</p> <p>Mentoring Committee - Develop survey for TF members to determine views of the proposed mentor program and strengths of each TF member.</p> |
| PERSON(S) RESPONSIBLE | Committee Members |
| DEADLINE | |
| AGENDA TOPIC | North Central WV CAA presentation by Vickie Geary |
| DISCUSSION | |
| ACTION ITEMS | |
| PERSON(S) RESPONSIBLE | |
| DEADLINE | |
| AGENDA TOPIC | Old Business |
| DISCUSSION | <p>HMIS Update Received all signed assurances and will be calling to schedule a date to complete the on-site Security Audit. Security Audit is a checklist to ensure all security measures required by the assurance are in place. Visit will also include setting up the agency to use HMIS. After visit, agency will be able to begin Intake training. 13 total agencies from the Homeless network will be on by the end of the year (3-4 are CAP). Will have the ability to switch customers between HMIS and CAP entry through an internal transfer process (similar to the customer transfer). Up to the agency who has security access to complete transfers.</p> <p>Task Force Schedule and Meeting Locations Bonnie Samu requested we reduce the TF meeting to one day, with committee meetings in the morning and TF in the afternoon. Judy Huntermark stated that she believes that is a good idea, but probably after the Strategic Planning committee is complete, because they seem to need a full day. Sandy Graham said the hard part is that many TF members are on multiple committees, because only a few volunteer. Bobbi Thomas Bailey said the recommendation of the Strategic Planning committee was to roll up the committees into the three area, and that may enable a one-day meeting. Vicki Geary suggested if they charge TF members to volunteer for a committee, TF wouldn't have the problem of multiple committees with the same person. Lesa Thomas stated that not all agencies have</p> |

the support to volunteer other member of their agency for committees. Melanie Pagliaro stated that we could allow TF to volunteer, or to have them selected for a committee. Bonnie Samu explained that being on a committee doesn't mean a lot of extra work. If the committees had more members, the tasks would be lighter.

Bonnie Samu asked for a vote of members who wish to reduce to one day. Majority of members voted yes. Sandy Graham explained that committee chairs have minutes and notes to type and organize for the TF meeting. Bonnie Samu suggested that we transition into one day, with the understanding that a one day meeting means more members need to volunteer for committee meetings. Lesa Thomas stated that its not the issue of one day vs. two day that keeps members from volunteering, it's the work in between that scares people away. She explained that TF should just set the one day meeting, and allow committees to decide on their own if they need to set a committee meeting, or if they can get their work done in the interim.

Motion by Sandy Graham that we schedule the full TF meeting for one day, and if a committee needs to meet the day before they are responsible for contacting GOEO about needing space. Sandy Graham asked before the vote, how soon would the committee roll-up would happen (based on the Strategic Planning), since that may increase membership. Melanie Pagliaro said that timeframe was unsure. Second by Judy Huntermark. All in favor. Motion carried.

Location and dates. Reopen discussion regarding location and date of next meeting in coordination with CAP Directors Meeting. July 26 is the WVCAP Director Meeting in Glade Springs. The WV ROMA TF meeting could be on July 25 at RCCAA. Andy Austin motioned to accept that date and location. Second by Heather Eldridge. Majority in Favor, Three Nea. Motion carried. RCCAA will send lodging information to Lisa June and she will distribute to the TF.

Transfer and Data Sharing Agreement

Asked all agencies to sign Agreement, which states that they agree to maintain confidentiality and to the transfer agreement already in place. Asking ED to sign if no objections. Mary Chipps has the document and will have it signed at the WVCAP Directors Meeting tomorrow and will then give it to OEO to sign and obtain the remaining signatures.

Discussion on Customer Transfer process. Lisa June will email out the Transfer Request form to all TF members. This process will cut down on time for SA. Lesa Thomas will send out information about how to download the converter, or how to save in older versions. Must download the converter for every Office product.

WVFACS Training Schedule – Lesa Thomas

Problems forced cancellation of the scheduled SA training. Has been rescheduled for first part of August, and will include new SA and those GOEO feels may need training based on the IS Report. Will then train with the new portions of the DBA FACS Pro manual. Training will be program specific and invite those working in those programs. Also

include trainings on intake and calculators.

Melanie Pagliaro asked if new Backup SA can be invited to the training. Lesa Thomas said yes. GOEO can get a classroom set up in the second floor conference room, and was able to get seven laptops running.

IS Requirements – Second Quarter Deadline – Lesa Thomas

Second Quarter IS Reports are due July 13.

Several agencies submitted first quarter IS Reports without Goals 2-5 which required the signed narrative. Those agencies will be asked to have a Go-To Meeting with GOEO and the ED before the second IS report to work through those issues.

WX Module Update – Sandy Graham

At the last TF meeting, spoke about having a WX committee. Sandy Graham spoke to Lynn Bartges about this. Lynn Bartges explained that the development of the WX Module is fine, a different situation from the Head Start Module, and did not require TF input. Three agencies have been chosen to test. Bonnie Samu asked that some kind of training be provided so that WX Coordinators and staff know how to use the reports and module.

Lesa Thomas said all questions should be directed to WX GOEO, and she understood that GOEO WX was receptive to offers by CAP WX Coordinators to help with input into system. Lesa Thomas said it is her understanding that the screens are complete and testing should begin soon.

Board Pro Module Update – Lesa Thomas

Go-To Meeting was conducted with three agencies. Those agencies will test with the current Board Meeting and supply input including additions and changes to Melanie Taylor and David Bassion by July 8.

CSBG Management Module Update – Lesa Thomas

About 90-95% complete. Spoke to Arley and Melanie about concerns raised at last TF meeting regarding financial restrictions. Made the necessary changes. Will start rolling out and beta testing the module around August. Management Module will support strong financial training for IS Report. Lesa Thomas asked if everyone knew the story about the IS financial problem. She explained that the guidance states to report the actual expenditures not the grant award, which is what is being reported. Therefore, need to have a strong training on the IS Report. Include discretionary, expenditures, youth and senior funding. Training will be done by NASCAP.

Funding of Meetings – ED Poll

After last TF Meeting, Lesa Thomas was asked not to poll EDs. ROMA TF meetings will go on as scheduled for now, with GOEO funding space, unless the meeting is at an agency. Then the agency will pick up the cost of space. Travel and per diem is still the responsibility of the agency.

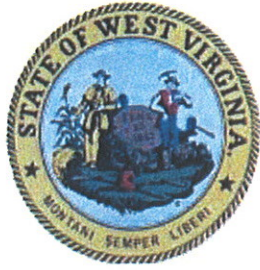
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| | <p>Lesa Thomas asked that it be made clear that this funding discussion was at the request of a TF member, not GOEO. TF may want to look into alternative funding sources to release the burden of the agency sending TF members.</p> |
| ACTION ITEMS | <p>The WV ROMA TF meeting will be July 25 at RCCAA. RCCAA will send out lodging information to Lisa and she will distribute to the TF.</p> <p>Lisa June will email out the Transfer Request form to all TF members.</p> <p>Lesa Thomas will send out information about how to download the converter, or how to save in older versions.</p> |
| PERSON(S) RESPONSIBLE | |
| DEADLINE | |
| AGENDA TOPIC | New Business |
| DISCUSSION | <p>Customer Problem Flag Bonnie Samu asked Lesa Thomas if there was a way to flag customers who have been refused service for some reason. Talked about a sanction code, but decided it would be better to develop a corrective AP to place in the customer's file. This will be developed by TF. Bonnie Samu asked for volunteers to work on this issue to develop the corrective AP and a way to flag these customers. Committee was formed with the following members: Butch Hatfield Andy Austin Joe Hancock Caron Burgess – Chair</p> <p>Agency Spotlights Bonnie Samu explained that we have strayed from the purpose of the TF. We are here to make decisions on the behalf of our agency. We do not need to know about other agencies programs, only ours.</p> <p>Lesa Thomas stated that she hears over and over that people don't know what CAP is, who the EDs are, where the agencies are located, and so forth. Vicki Geary explained that her concern was that if the TF had guest speakers, the TF member may not be the person EDs want to attend that session. She explained that these sessions should be open to the entire network. Bobbi Thomas-Bailey said she didn't think it was the TF job to create programs and asked about the McKinney speaker. Lesa Thomas explained that it wasn't to establish new programs. That speaker was introduced to speak about the Homeless children, and how and why to designate homeless children, and how it pertains to the Homeless agencies, as well as agencies with the designation situation. Other TF members explained that these speakers were intended to enlighten TF members on issues pertaining to ROMA and DBA FACS Pro, such as living wage, and family development. Teresa Shepard explained that that was also the focus of the agency spotlight – to bring</p> |

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| | <p>to light agencies that were doing a particular program successfully, so that other agencies may be able to immitate them on issues such as FACS entry, intake process, and outcomes/indicators used.</p> <p>Motion by Judy Huntermark to stop Agency spotlights Second by Andy Austin All in favor- Motion carried</p> <p>Motion by Debbie Wilfong to move forward on securing speakers that will enable the TF to move forward on its mission. Second by Butch Hatfied Melanie Pagliaro stated that she feels this is a great thing to roll up into the Strategic Planning areas. Vicki Geary asked about funding. Bonnie Samu said that the speakers would be on a volunteer basis. Bobbi Thomas-Bailey asked that these speakers be done during committee meetings. Debbie Wilfong suggested having them at beginning or ending of the meeting to allow those who the speaker doesn't pertain to, to leave. All in favor – Motion carried.</p> |
| ACTION ITEMS | <p>Committee to work on Customer Flag issue to develop the corrective AP and a way to flag these customers. Committee Members: Caron Burgess - Chair Butch Hatfield Andy Austin Joe Hancock</p> |
| PERSON(S) RESPONSIBLE | |
| DEADLINE | |
| | |
| NEXT TF Meeting | July 25 at RCCAA |



Attachment 7
WV GOEO Calendar





GOEO Calendar

WV Governor's Office of Economic Opportunity

August 2007

Wednesday, August 1st

| | | |
|-----------------------------------|--|--|
| Category Weatherization | Event: Nicholas CAP Monitoring Time: All day or non-timed Program Management Monitoring of Nicholas CAP | Contact none |
| More Info none | Location Details: Nicholas Community Action Partnership, Inc., 1205 Broad Styreet, Summersville, WV, 26651 | Location Nicholas Community Action Partnership, Inc. |

Monday, August 6th

| | | |
|-----------------------------------|---|---|
| Category Weatherization | Event: Council of the Southern Mountains Monitoring Time: All day or non-timed Program Management of Council of the Southern Mountains | Contact none |
| More Info none | | Location Council of the Souther Mountains |

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|-----------------------------------|---|--|
| Category Weatherization | Event: Nicholas CAP Monitoring Time: All day or non-timed Field Monitoring of Nicholas CAP | Contact none |
| More Info none | Location Details: Nicholas Community Action Partnership, Inc., 1205 Broad Styreet, Summersville, WV, 26651 | Location Nicholas Community Action Partnership, Inc. |

| | | |
|---|---|---|
| Category CSBG and ROMA Task Force | Event: GOEO Monitoring - Mountain CAP, Inc. Time: 1:00 am - not given GOEO Monitoring Visit | Contact Arley Johnson, 304-558-8860-11, ajohnson@oeo.state.wv.us |
| More Info none | Monitoring Chairperson: Arley R. Johnson Team Members: Lesa Thomas Julie Haden Franson James Ed Teter Melanie Taylor Lyn Bartges | Location Mountain CAP of WV, Inc. |
| | Location Details: Mountain CAP of WV, Inc., 26 North Kanawha Street, Buckhannon, WV, 26201 | |

Tuesday, August 7th

| | | |
|-----------------------------------|---|---|
| Category Weatherization | Event: Council of the Southern Mountains Monitoring Time: All day or non-timed Program Management of Council of the Southern Mountains | Contact none |
| More Info none | | Location Council of the Souther Mountains |

Category
Weatherization

Event: [Nicholas CAP Monitoring](#) **Time:** All day or non-timed

Contact
none

More Info
none

Location Details: Nicholas Community Action Partnership, Inc., 1205 Broad Styreet, Summersville, WV, 26651

Location
Nicholas Community Action Partnership, Inc.

Category
CSBG and ROMA Task Force

Event: [GOEO Monitoring - Mountain CAP, Inc.](#) **Time:** 1:00 am - not given

Contact
Arley Johnson, 304-558-8860-11, ajohnson@oeo.state.wv.us

More Info
none

Monitoring Chairperson: Arley R. Johnson
Team Members:
Lesa Thomas
Julie Haden
Franson James
Ed Teter
Melanie Taylor
Lyn Bartges

Location
Mountain CAP of WV, Inc.

Location Details: Mountain CAP of WV, Inc., 26 North Kanawha Street, Buckhannon, WV, 26201

Wednesday, August 8th

Category
Weatherization

Event: [Council of the Southern Mountains Monitoring](#) **Time:** All day or non-timed

Contact
none

More Info
none

Program Management of Council of the Southern Mountains

Location
Council of the Souther Mountains

Category
Weatherization

Event: [Nicholas CAP Monitoring](#) **Time:** All day or non-timed

Contact
none

More Info
none

Location Details: Nicholas Community Action Partnership, Inc., 1205 Broad Styreet, Summersville, WV, 26651

Location
Nicholas Community Action Partnership, Inc.

Category
CSBG and ROMA Task Force

Event: [GOEO Monitoring - Mountain CAP, Inc.](#) **Time:** 1:00 am - not given

Contact
Arley Johnson, 304-558-8860-11, ajohnson@oeo.state.wv.us

More Info
none

Monitoring Chairperson: Arley R. Johnson
Team Members:
Lesa Thomas
Julie Haden
Franson James
Ed Teter
Melanie Taylor
Lyn Bartges

Location
Mountain CAP of WV, Inc.

Location Details: Mountain CAP of WV, Inc., 26 North Kanawha Street, Buckhannon, WV, 26201

Thursday, August 9th

Category
Weatherization

Event: [Council of the Southern Mountains Monitoring](#) **Time:** All day or non-timed

Contact
none

More Info
none

Program Management of Council of the Southern Mountains

Location
Council of the Souther Mountains

Category
Weatherization

Event: [Nicholas CAP Monitoring](#) **Time:** All day or non-timed
Field Monitoring of Nicholas CAP

Contact
none

More Info
none

Location Details: Nicholas Community Action Partnership, Inc.,
1205 Broad Styreet, Summersville, WV, 26651

Location
Nicholas Community Action Partnership, Inc.

Category
CSBG and ROMA Task Force

Event: [GOEO Monitoring - Mountain CAP, Inc.](#) **Time:** 1:00 am - not given
GOEO Monitoring Visit

Contact
Arley Johnson, 304-558-8860-11,
ajohnson@oeo.state.wv.us

More Info
none

Monitoring Chairperson: Arley R. Johnson
Team Members:
Lesa Thomas
Julie Haden
Franson James
Ed Teter
Melanie Taylor
Lyn Bartges

Location
Mountain CAP of WV, Inc.

Location Details: Mountain CAP of WV, Inc., 26 North Kanawha Street, Buckhannon, WV, 26201

Friday, August 10th

Category
CSBG and ROMA Task Force

Event: [GOEO Monitoring - Mountain CAP, Inc.](#) **Time:** 1:00 am - not given
GOEO Monitoring Visit

Contact
Arley Johnson, 304-558-8860-11,
ajohnson@oeo.state.wv.us

More Info
none

Monitoring Chairperson: Arley R. Johnson
Team Members:
Lesa Thomas
Julie Haden
Franson James
Ed Teter
Melanie Taylor
Lyn Bartges

Location
Mountain CAP of WV, Inc.

Location Details: Mountain CAP of WV, Inc., 26 North Kanawha Street, Buckhannon, WV, 26201

Thursday, August 16th

Category
Homeless Services

Event: [Interagency Council on Homelessness](#) **Time:** 9:00 am - 12:00 pm

Contact
none

More Info
none

Location
none

Tuesday, August 21st

Category
CSBG and ROMA Task Force

Event: [DBA FACS Pro-Agency SA, IS and Implementation Training](#) **Time:** All day or non-timed
**CSBG IS Report Issues Review and Remedies

Contact
Lesla Thomas, 304-558-8860 ext. 29,
lthomas@oeo.state.wv.us

More Info
none

**Agency System Administrator - Orientation, Roles/Responsibilities and Training

**DBA FACS Pro Implementation Planning and Assistance - What level of implementation is your agency ready to commit to? What level of implementation is your agency interested in...Compliance only, programmatic only or full management information system?

Location
GOEO - 2nd Floor Conference Room

Location Details: GOEO - 2nd Floor Conference Room, 950

Kanawha Boulevard East, 2nd Floor, Charleston, WV, 26541

Wednesday, August 22nd

Category
CSBG and ROMA Task Force

More Info
none

Event: DBA FACS Pro-Agency SA, **Time:** All day or non-timed
IS and Implementation Training
**CSBG IS Report Issues Review and Remedies

**Agency System Administrator - Orientation, Roles/Responsibilities and Training

**DBA FACS Pro Implementation Planning and Assistance - What level of implementation is your agency ready to commit to? What level of implementation is your agency interested in...Compliance only, programmatic only or full management information system?

Location Details: GOEO - 2nd Floor Conference Room, 950 Kanawha Boulevard East, 2nd Floor, Charleston, WV, 26541

Contact
Lesa Thomas, 304-558-8860 ext. 29,
lthomas@oeo.state.wv.us

Location
GOEO - 2nd Floor Conference Room

Thursday, August 23rd

Category
CSBG and ROMA Task Force

More Info
none

Event: DBA FACS Pro-Agency SA, **Time:** All day or non-timed
IS and Implementation Training
**CSBG IS Report Issues Review and Remedies

**Agency System Administrator - Orientation, Roles/Responsibilities and Training

**DBA FACS Pro Implementation Planning and Assistance - What level of implementation is your agency ready to commit to? What level of implementation is your agency interested in...Compliance only, programmatic only or full management information system?

Location Details: GOEO - 2nd Floor Conference Room, 950 Kanawha Boulevard East, 2nd Floor, Charleston, WV, 26541

Contact
Lesa Thomas, 304-558-8860 ext. 29,
lthomas@oeo.state.wv.us

Location
GOEO - 2nd Floor Conference Room

Monday, August 27th

Category
Weatherization

More Info
none

Event: Community Resources, Inc. **Time:** All day or non-timed
Monitoring
Program Management and Field Monitoring of Community Resources, Inc.

Location Details: Community Resources, Inc., Parkersburg, WV

Contact
none

Location
Community Resources, Inc.

Category
Weatherization

More Info
none

Event: Southwestern CAC, Inc. **Time:** All day or non-timed
Monitoring
Field Monitoring of Southwestern CAC, Inc.

Location Details: Southwestern Community Action Council, Inc., 540 Fifth Avenue, Huntington, WV, 25701

Contact
none

Location
Southwestern Community Action Council, Inc.

Tuesday, August 28th

Category
Weatherization

More Info
none

Event: Community Resources, Inc. **Time:** All day or non-timed
Monitoring
Program Management and Field Monitoring of Community Resources, Inc.

Location Details: Community Resources, Inc., Parkersburg, WV

Contact
none

Location
Community Resources, Inc.

Category
Weatherization

More Info

Event: Southwestern CAC, Inc. **Time:** All day or non-timed
Monitoring
Field Monitoring of Southwestern CAC, Inc.

Location Details: Southwestern Community Action Council, Inc.,

Contact
none

Location
Southwestern Community

none 540 Fifth Avenue, Huntington, WV, 25701 Action Council, Inc.

Wednesday, August 29th

Category
Weatherization
Event: Community Resources, Inc. **Time:** All day or non-timed
Monitoring
Program Management and Field Monitoring of Community
More Info Resources, Inc.
none
Location Details: Community Resources, Inc., Parkersburg, WV
Contact
none
Location
Community Resources,
Inc.

Category
Weatherization
Event: Southwestern CAC, Inc. **Time:** All day or non-timed
Monitoring
Field Monitoring of Southwestern CAC, Inc.
More Info
none
Location Details: Southwestern Community Action Council, Inc.,
540 Fifth Avenue, Huntington, WV, 25701
Contact
none
Location
Southwestern Community
Action Council, Inc.

Thursday, August 30th

Category
CSBG and ROMA Task Force
Event: DBA FACS Pro - Intake and Time: 9:00 am - 5:00 pm
Basics
Learn about the philosophy and methodology behind central and
More Info comprehensive intake.
none
Location
*Central Intake - spotting errors, implementing LIVE intake in your
agency
*DBA FACS Pro Intake Processes
GOEO - 2nd Floor
Conference Room
Location Details: GOEO - 2nd Floor Conference Room, 950
Kanawha Boulevard East, 2nd Floor, Charleston, WV, 26541

Friday, August 31st

Category
CSBG and ROMA Task Force
Event: CSBG State Plan for West Time: All day or non-timed
Virginia Due to OCS
West Virginia CSBG State Plan due to OCS for Program Years 2008
More Info and 2009.
none
Contact
none
Location
none

Legend: Administration Homeless Services Conference Room Weatherization CSBG and ROMA Task Force WV Community Action