

(2nd Year Submission)

The Office of Community Services (OCS) is providing a Microsoft Word version of the revised draft Model State Plan (MSP) for CSBG state agencies that have submitted a two year plan in FY 2015, to use for the planning and development of their FY 2016 State Plan submissions. While states are encouraged to complete all questions to the extent possible, OCS has highlighted in **yellow** the critical items for the OCS performance management and accountability framework. OCS will provide additional guidance and instructions for plan submission. Please Note, OMB is currently reviewing this revised draft and may make final adjustments.

Community Services Block Grant (CSBG) Model State Plan

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Mandatory Grant Application SF-424

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SECTION 1

CSBG Lead Agency, CSBG Authorized Official, CSBG Point of Contact, and Official State Designation Letter

1.1. Provide the following information in relation to the lead agency designated to administer CSBG in the State, as required by Section 676(a) of the CSBG Act. The following information should mirror the information provided on the Application for Federal Assistance, SF-424M.

1.1a. Lead agency **[Narrative, 2500 Characters]**

Nebraska Department of Health and Human Services

1.1b. Cabinet or administrative department of this lead agency **[Check One and narrative where applicable]**

- Community Services Department
 - Human Services Department
 - Social Services Department
 - Governor's Office
 - Community Affairs Department
- Other, describe: **[Narrative, 2500 characters]**

1.1c. Division, bureau, or office of the CSBG authorized official **[Narrative, 2500 Characters]**

Children and Family Services Division, Economic Assistance Unit

1.1d. Authorized official of the lead agency **[Narrative, 2500 Characters]**

Instructional note: The authorized official could be the director, secretary, commissioner etc. as assigned in the designation letter (attached under item 1.3). The authorized official is the person indicated as authorized representative on the SF-424M.

Tony Green, Acting Director, Children and Family Services Division

1.1e. Street address **[Narrative, 2500 characters]**

301 Centennial Mall South, PO Box 95026

1.1f. City **[Narrative, 2500 characters]**

Lincoln

1.1g. State **[Dropdown]**

NE

1.1h. Zip **[Narrative, 5 characters]**

68509

1.1i. Telephone number and extension [Narrative, 10 – 15 characters which includes option for 5 digit extension]

402-471-1878

1.1j. Fax number [Narrative, 10 characters]

402-471-9449

1.1k. Email address [Narrative, 2500 characters]

tony.green@nebraska.gov

1.1l. Lead agency website [Narrative, 2500 characters]

dhhs.ne.gov

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1.2. Provide the following information in relation to the designated State CSBG point of contact.

Instructional Note: The State CSBG point of contact should be the person that will be the main point of contact for CSBG within the State.

1.2a. Agency name **[Narrative, 2500 characters]**

Nebraska Department of Health and Human Services

1.2b. Name of the point of contact **[Narrative, 2500 characters]**

Jennifer Dreibelbis, CSBG Program Specialist

1.2c. Street address **[Narrative, 2500 characters]**

220 South 17th Street, PO Box 95026

1.2d. City **[Narrative, 2500 characters]**

Lincoln

1.2e. State **[Dropdown]**

NE

1.2f. Zip **[Narrative, 5 characters]**

68509

1.2g. Point of contact telephone number **[Narrative, 10 – 15 characters which includes option for entering up to 5 digit extension]**

402-471-9346

1.2h. Fax number **[Narrative, 10 characters]**

402-471-9286

1.2i. Point of contact email address **[Narrative, 2500 characters]**

jennifer.dreibelbis@nebraska.gov

1.2j. Point of contact agency website **[Narrative, 2500 characters]**

dhhs.ne.gov

1.3. Designation Letter: Attach the State's official CSBG designation letter. If either the governor or designated agency has changed, update the letter accordingly. **[Attach a document]**

This version of the MSP is currently under review by OMB, which may result in additional edits.

Instructional Note: The letter should be from the chief executive officer of the State and include, at minimum, the designated State CSBG lead agency and title of the authorized official of the lead agency who is to administer the CSBG grant award.

[Attachment 1: Governor designation letter Pending. See Teri Chasten email 6-23-2015](#)

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SECTION 2 State Legislation and Regulation

- 2.1. CSBG State Legislation:** Does the State have a statute authorizing CSBG? Yes No
- 2.2. CSBG State Regulation:** Does the State have regulations for CSBG? Yes No
- 2.3.** If yes was selected in item 2.1 or 2.2, attach a copy (or copies) of legislation and/or regulations or provide a hyperlink(s), as appropriate. **[Attach a document and/or provide a link]**

Attachment 2: Title 481 at http://dhhs.ne.gov/Pages/reg_t481.aspx

Due to be updated in FY2016 to reflect new OMB rules and CSBG Organizational Standards and State and Federal Accountability Measures.

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

SECTION 3 State Plan Development and Statewide Goals

3.1. CSBG Lead Agency Mission and Responsibilities: Briefly describe the mission and responsibilities of the State agency that serves as the CSBG lead agency. **[Narrative, 2500 characters]**

The mission of the Nebraska Department of Health and Human Services is ‘Helping people live better lives’. The Department of Health and Human Services provides important, and, oftentimes, life-sustaining services to Nebraskans. The department looks for ways to effectively provide these services and make a difference in the lives of people.

The Nebraska Department of Health and Human Services adopted Values and Core Competencies it strives for in all programs. These are:

1. Constant Commitment to Excellence
2. High Personal Standard of Integrity
3. Positive and Constructive Attitude and Actions
4. Openness to New Learning
5. Dedication to the Success of Others

3.2. State Plan Goals: Describe the State’s CSBG-specific goals for State administration of CSBG under this State Plan. **[Narrative, 2500 characters]**

Instructional Note: For examples of “goals,” see State Accountability Measure 1Sa(i).

Note: This information is associated with State Accountability Measure 1Sa(i) and may pre-populate the State’s annual report form.

Eligible Entity Specific

1. No eligible entities in a Quality Improvement Plan (QIP) by FY2018. The State will monitor eligible entities for compliance with state and federal laws concerning grants management and the CSBG Act.
2. All 9 eligible entities meet at least 80% of the Organizational Standards by FY2017 review. The State will provide training and technical assistance to agencies as needed to ensure the eligible entities have tools available and improve their status with Organizational Standards.
3. No eligible entity is in the In Crisis category by FY2018. The State will work with vulnerable and in crisis agencies, to ensure the eligible entity has the information and tools available to be competitive, high performing and providing services to the community it serves.
4. Five of the nine agencies implement a new program or significantly change an existing program to better meet needs identified in the community needs assessment by FY2018. The State will work with stable and thriving agencies to incorporate innovative and collaborative projects in its service delivery.

State Specific

1. Complete written CSBG Policies and Procedures by January 2016
2. Complete revision of Title 481 regulations by September 2016 to ensure compatibility with new OMB guidance, Organizational Standard and CSBG State and Federal Accountability Measures.
3. Revise internal policies within allowability to address timeliness of subgrant and payment processes to incorporate by October 2016.

3.3. State Plan Development: Indicate the information and input the State accessed to develop this State Plan.

3.3a. Analysis of [Check all that applies and narrative where applicable]

- State Performance Indicators and/or National Performance Indicators (NPIs)
- U.S. Census data
- State performance management data (e.g., accountability measures, ACSI survey information, and/or other information from annual reports)
- Other data (describe) **[Narrative, 2500 characters]**
- Eligible entity community needs assessments
- Eligible entity plans

- Other information from eligible entities, e.g., State required reports (describe)

[Narrative, 2500 characters]

Since Nebraska is in the middle of a two year approved CSBG State Plan, the state office relied on the eligible entities FY2016 plans and other information provided by the eligible entities to complete the new required components of this year's plan. For FY2017-2018, Nebraska will rely on multiple sources to complete its full two year state plan.

3.3b. Consultation with [Check all that applies and narrative where applicable]

Eligible entities (e.g., meetings, conferences, webinars; not including the public hearing)

State community action association and regional CSBG T & TA providers

- State partners and/or stakeholders (describe) **[Narrative, 2500 characters]**
- National organizations (describe) **[Narrative, 2500 characters]**
- Other (describe) **[Narrative, 2500 characters]**

3.4. Eligible Entity Involvement

3.4a. Describe the specific steps the State took in developing the State Plan to involve the eligible entities. [Narrative, 2500 Characters]

This version of the MSP is currently under review by OMB, which may result in additional edits.

Note: This information is associated with State Accountability Measures 1Sa(ii) and may pre-populate the State's annual report form.

Nebraska reviewed the eligible entities annual plans submitted in July 2015 to ensure that the information reflected here was indicative of what the eligible entities were doing in their service areas. Nebraska also looked at past reports and desk audits from the previous years to help identify the state goals, training and technical assistance needs of eligible entities and community conditions.

The State CSBG Program emailed the The DRAFT state plan to all eligible entities and the state association office prior to submission.

The state also held a public hearing on August 13, 2015 to allow eligible entities as well as interested public members to provide comments and feedback on the proposed state plan.

If this is the first year filling out the automated State Plan, skip the following question.

3.4b. Performance Management Adjustment: How has the State adjusted State Plan development procedures under this State Plan, as compared to past plans, in order 1) to encourage eligible entity participation and 2) to ensure the State Plan reflects input from eligible entities? Any adjustment should be based on the State's analysis of past performance in these areas, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the State is not making any adjustments, provide further detail. **[Narrative, 2500 Characters]**

Note: This information is associated with State Accountability Measures 1Sb(i) and (ii) and may pre-populate the State's annual report form.

If this is the first year filling out the automated State Plan, skip the following question.

3.5. Eligible Entity Overall Satisfaction: Provide the State's target for eligible entity Overall Satisfaction during the performance period: _____. **[Numerical, 3 digits]**

Instructional Note: The State's target score will indicate improvement or maintenance of the States' Overall Satisfaction score from the most recent American Customer Survey Index (ACSI) survey of the State's eligible entities. (See information about the ACSI in the CSBG State Accountability Measures document.)

Note: Item 3.5 is associated with State Accountability Measure 8S and may pre-populate the State's annual report form.

SECTION 4

CSBG Hearing Requirements

- 4.1. Public Inspection:** Describe how the State made this State Plan, or revision(s) to the State Plan, available for public inspection, as required under Section 676(e)(2) of the Act. **[Narrative, 2500 Characters]**

Nebraska publishes the DRAFT State Plan to the dhhs.ne.gov website for 14 days to allow interested parties to review and offer comments. The plan is mailed to anyone who requests a copy for review. For this review, ___ people asked for a paper copy. Nebraska also held a public hearing on August 13, 2015 to allow anyone to comment on the draft plan. The eligible entities also receive a copy via email and are encouraged to share the information as widely as they would like.

- 4.2. Public Notice/Hearing:** Describe how the State ensured there was sufficient time and statewide distribution of notice of the public hearing(s) to allow the public to comment on the State Plan, as required under 676(a)(2)(B) of the CSBG Act. **[Narrative, 2500 Characters]**

Nebraska published the public hearing notice in the Omaha World Herald and the Lincoln Journal Star, the two papers with the largest statewide distribution. The draft state plan is also posted on the dhhs.ne.gov website to allow people to review the information prior to the public hearing. Notice of the public hearing is also provided on the dhhs.ne.gov website. All eligible entities and grantees receiving discretionary money are notified via email of the upcoming public hearing.

- 4.3. Public and Legislative Hearings:** Specify the date(s) and location(s) of the public and legislative hearing(s) held by the designated lead agency for this State Plan, as required under Section 676(a)(2)(B) and Section 676(a)(3) of the Act. (If the State has not held a public hearing in the prior fiscal year and/or a legislative hearing in the last three years, provide further detail).

Instructional Note: The date(s) for the public hearing(s) must have occurred in the year prior to the first Federal fiscal year covered by this plan. Legislative hearings are held at least every three years, and must have occurred within the last three years prior to the first Federal fiscal year covered by this plan.

Date	Location	Type of Hearing [Select an option]
February 7, 2014	Nebraska State Capitol Room 1510 Lincoln, NE 68508	<ul style="list-style-type: none"> <input checked="" type="radio"/> Legislative
August 14, 2014	Nebraska State Office Building, 301 Centennial Mall South	<ul style="list-style-type: none"> <input checked="" type="radio"/> Public <input type="radio"/> Legislative <input type="radio"/> Combined

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Date	Location	Type of Hearing [Select an option]
	Lincoln, NE 68509 ROOM: LLA	
August 13, 2015	PENDING	<input checked="" type="radio"/> Public
ADD a ROW function Note: rows will be able to be added for each additional hearing		

4.4. Attach supporting documentation or a hyperlink for the public and legislative hearings. [Attach a document or provide a hyperlink.]

Attachment 4.4 Pending. Include public hearing notice (affidavit) from papers and transcript.

Attachment 4.4. Legislative hearing Rought Draft Health and Human Services Committee meeting 2-7-2014

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SECTION 5 CSBG Eligible Entities

5.1. CSBG Eligible Entities: In the table below, list each eligible entity in the State, and indicate public or private, the type(s) of entity, and the geographical area served by the entity. (This table should include every CSBG Eligible Entity to which the State plans to allocate 90 percent funds, as indicated in the table in item 7.2. Do not include entities that only receive remainder/discretionary funds from the State or tribes/tribal organizations that receive direct funding from OCS under Section 677 of the CSBG Act.)

CSBG Eligible Entity	Public or Nonprofit	Type of Entity	Geographical Area Served by County	Brief Description of 'Other'
Blue Valley Community Action Partnership (BVCA)	Nonprofit	Community Action Agency	Butler, Fillmore, Gage, Jefferson, Polk, Saline, Seward, Thayer, York	NA
Community Action Partnership of Lancaster and Saunders Counties (CAPLSC)	Nonprofit	Community Action Agency	Lancaster, Saunders	NA
Community Action Partnership of Western Nebraska (CAPWN)	Nonprofit	Community Action Agency	Scottsbluff, Morrill, Cheyenne, Kimball, Garden, Banner, Deuel	NA
Central Nebraska Community Services (CNCS)	Nonprofit	Community Action Agency	Boone, Colfax, Platte, Boyd, Holt, Wheeler, Brown, Keya Paha, Rock, Hall, Howard, Hamilton, Merrick, Nance, Blaine, Custer, Loup, Sherman, Valley, Garfield, Greeley	NA

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Eastern Nebraska Community Action Partnership (ENCAP)	Nonprofit	Community Action Agency	Douglas, Sarpy	NA
Community Action Partnership of Mid Nebraska (Mid)	Nonprofit	Community Action Agency	Grant, Hooker, Thomas, Arthur, McPherson, Logan, Keith, Lincoln, Perkins, Dawson, Buffalo, Chase, Hayes, Frontier, Gosper, Phelps, Kearney, Adams, Clay, Dundy, Hitchcock, Red Willow, Furnas, Harlan, Franklin, Webster, Nuckolls	NA
Northwest Community Action Partnership (NCAP)	Nonprofit	Community Action Agency	Cherry, Sheridan, Box Butte, Dawes, Sioux	NA
Northeast Nebraska Community Action Partnership (NENCAP)	Nonprofit	Community Action Agency	Antelope, Burt, Cedar, Cuming, Dakota, Dixon, Dodge, Knox, Madison, Pierce, Stanton, Thurston, Washington, Wayne	NA
Southeast Nebraska Community Action Partnership (SENCAP)	Nonprofit	Community Action Agency	Cass, Otoe, Johnson, Nemaha, Pawnee, Richardson	NA

5.2. Total number of CSBG eligible entities: 9 [This will automatically update based on chart in 5.1]

5.3. Changes to Eligible Entities List: Has the list of eligible entities under item 5.1 changed since the State’s last State Plan submission? If yes, briefly describe the changes. Yes X No
[If yes is selected – Narrative, 2500 characters]

Instructional Note: Limited Purpose Agency refers to an eligible entity that was designated as a limited purpose agency under title II of the Economic Opportunity Act of 1964 for fiscal year 1981, that served the general purposes of a community action agency under title II of the Economic Opportunity Act, that did not lose its designation as a limited purpose agency under title II of the Economic Opportunity Act as a result of failure to comply with that Act and that has not lost its designation as an eligible entity under the CSBG Act.

Instructional Note: 90 percent funds are the funds a State provides to eligible entities to carry out the purposes of the CSBG Act, as described under Section 675C of the CSBG Act. A State must provide “no less than 90 percent” of their CSBG allocation, under Section 675B, to the eligible entities.

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SECTION 6 Organizational Standards for Eligible Entities

Note: Reference IM 138, *State Establishment of Organizational Standards for CSBG Eligible Entities*, for more information on Organizational Standards. Click [HERE](#) for IM 138.

6.1. Choice of Standards: Check the box that applies. If using alternative standards, a) attach the complete list of alternative organizational standards, b) describe the reasons for using alternative standards, and c) describe how the standards are at least as rigorous as the COE-developed standards.

The State will use the CSBG Organizational Standards Center of Excellence (COE) organizational standards (as described in IM 138)

The State will use an alternative set of organizational standards **[Attach supporting documentation if this option is selected]**

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

6.2a. If yes was selected in item 6.2, describe the State's proposed minor modification to the COE-developed organizational standards, and provide a rationale. **[Narrative, 2500 characters]**

NA

6.3. How will/has the State officially adopt(ed) organizational standards for eligible entities in the State in a manner consistent with the State's administrative procedures act? If "Other" is selected, provide a timeline and additional information, as necessary. **[Check all that applies and narrative where applicable]**

- Regulation
- Policy

Contracts with eligible entities

Other, describe: **[Narrative, 2500 characters]**

Nebraska will work with the eligible entities and DHHS administration to develop policies and procedures for the CSBG program and incorporate Organizational Standards and Federal and State Performance Measures into those policies and procedures.

6.4. How will the State assess eligible entities against organizational standards, as described in IM 138? **[Check all that applies]**

- Peer-to-peer review (with validation by the State or State-authorized third party)
- Self-assessment (with validation by the State or State-authorized third party)

- Self-assessment/peer review with State risk analysis
- State-authorized third party validation

X Regular, on-site CSBG monitoring

X Other

6.4a. Describe the assessment process. [Narrative, 2500 characters]

In the first year, FY2016, the CSBG Program Specialist will do an on site visit of all nine (9) eligible entities to look specifically at the Organizational Standards. Those agencies who are in a quality improvement plan will have an on site review as well as a review of their adherence to the Organizational Standards. Those who had a regularly scheduled on site review in FY2016 will have the Organizational Standards reviewed along side the normal on site review. In FY2015, the State CSBG Program revised its on site monitoring tool to ensure all the Organizational Standards were incorporated during an on site review. Since eligible entities are reviewed biannually, the State CSBG Program will need to determine how to do the annual review of Organizational Standards. During FY2016, Nebraska will work with eligible entities and the state association to determine how to conduct the yearly Organizational Standards reviews going forward. The network will indentify which format to use for FY2017 on which may include peer review or third party validation if able to indentify a third party.

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

6.5a. If yes was selected in item 6.5, list the specific eligible entities the State will exempt from meeting organizational standards, and provide a description and a justification for each exemption. **[Narrative, 2500 characters or attach document]**

NA

If this is the first year filling out the automated State Plan, skip the following question.

6.6. Performance Target: What percentage of eligible entities in the State does the State expect will meet all the State-adopted organizational standards in the next year? **[Insert a percentage]**

Note: This information is associated with State Accountability Measures 6Sa and may pre-populate the State’s annual report form.

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SECTION 7 State Use of Funds

Eligible Entity Allocation (90 Percent Funds) [Section 675C(a) of the CSBG Act]

7.1 Formula: Select the method (formula) that best describes the current practice for allocating CSBG funds to eligible entities. **[Check one and narrative where applicable]**

- Historic
- X Base + Formula
- Formula Alone
- Formula with Variables
- Hold Harmless + Formula
- Other **[Narrative, 2500 Characters]**

7.1a. Does the State statutory or regulatory authority specify the terms or formula for allocating the 90 percent funds among eligible entities? Yes X No

7.2. Planned Allocation: Specify the planned allocation of 90 percent funds to eligible entities, as described under Section 675C(a) of the CSBG Act. The estimated allocations may be in dollars or percentages. For each eligible entity receiving funds, provide the Funding Amount in either dollars (columns 2 and 4) or percentage (columns 3 and 5) for the fiscal years covered by this plan.

CSBG Eligible Entity	Planned CSBG 90 Percent Funds			
	Year One (FY2015)		Year Two (FY2016) Estimate	
	Funding Amount \$	Funding Amount %	Funding Amount \$	Funding Amount %
Blue Valley Community Action (BVCA)	\$293,066	6.965%	\$293,066	6.965%
Community Action Partnership of Lancaster and Saunders Counties (CAPLSC)	\$604,562	14.368%	\$604,562	14.368%
Community Action Partnership of Western Nebraska (CAPWN)	\$274,763	6.530%	\$274,763	6.530%
Central Nebraska Community Services (CNCS)	\$468,316	11.130%	\$468,316	11.130%

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Eastern Nebraska Community Action Partnership (ENCAP)	\$1,064,968	25.310%	\$1,064,968	25.310%
Community Action Partnership of Mid Nebraska (Mid)	\$554,448	13.177%	\$554,448	13.177%
Northwest Community Action Partnership (NCAP)	\$212,867	5.059%	\$212,867	5.059%
Northeast Nebraska Community Action Partnership (NENCAP)	\$498,780	11.854%	\$498,780	11.854%
Southeast Nebraska Community Action Partnership (SENCAP)	\$235,925	5.607%	\$235,925	5.607%
TOTAL	\$4,207,695	100.000%	\$4,207,695	100.000%

7.3. Distribution Process: Describe the specific steps in the State’s process for distributing 90 percent funds to the eligible entities and include the number of days each step is expected to take; include information about State legislative approval or other types of administrative approval (such as approval by a board or commission). **[Narrative, 2500 Characters]**

For ease, a spreadsheet is provided at the end of this description with the estimated time for each step.

Nebraska starts the subgrant process upon receipt of a Notice of Award letter from the funding agency, in this case, Office of Community Services. The subgrant amount can only be written for the amount expressed on the “This Action” portion of the Notice of Award. If the full amount is not listed in the “Allotment” section then the State CSBG Program must issue amendments for each partial allotment Notice of Award received.

Once the Notice of Award is received, the State CSBG Program prepares the subgrants for approval through the Economic Assistance Unit Administrators and legal representative. Once approved by Economic Assistance Unit Administrators, the subgrants go into an automated approval system called NIS. In this system, NDHHS Legal department, Support Services, Grants Management and Administration approve the subgrants. Once the subgrants are approved by all entities, the State CSBG Program receives notification from Support Services that they have been approved and they are given a Y3 number. The State CSBG Program sends a PDF copy to each of the subgrantees (the 9 eligible entities) for Executive Director/CEO signature. Once the

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signed original copies are received via US Mail (NDHHS cannot accept electronic signatures at this time) at the State CSBG Program, the signed subgrants are routed through Economic Assistance Administrators to the NDHHS designee to sign the subgrant. Once the subgrant is received with all signatures (both eligible entity and NDHHS), the subgrant is sent to Support Services to load into the NIS system for payment. Support Services then notifies the State CSBG Program that payments can be made on the executed subgrants.

Once subgrant is executed, payments take anywhere from 7 -21 days to process through the system for payment to the eligible entity. Payments are initiated by the State CSBG Program through an automated system called OnBase. Once the payment is entered and approved on the program side, approvals continue through Support Services, Grants Management and Accounting. Accounting notifies the program staff when payment has been completed. The eligible entity can expect payment within two (2) to three (3) working days from that notice.

Each time an amendment is needed when more money is distributed on the grant, the same process repeats for each amendment.

Estimated Time Frame for Subgrants to payment	
Steps	Usual Time Frame
Economic Assistance Prior Approval	30 days
NIS Approvals	30 days
Notification from Support Services	3 days
PDF sent to Eligible Entities	1 day
Eligible Entity returns Signed subgrant	14 days
Signed subgrant to Economic Assistance for routing	1 day
Signature from NDHHS Representative	7 days
Loaded into NIS for payments	3 days
Payments coded to subgrant	1 day
Payments made to grantee	21 days
Total time	111 days

7.4. Distribution Timeframe: Does the State plan to make funds available to eligible entities no later than 30 calendar days after OCS distributes the Federal award? Yes No

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7.4a. If no, describe State procedures to ensure funds are made available to eligible entities consistently and without interruption. **[Narrative, 2500 Characters]**

Note: Item 7.4 is associated with State Accountability Measure 2Sa and may pre-populate the State's annual report form.

Please see 7.3 for the process and timeline for approving subgrants and payments within NDHHS.

Once a subgrant is executed and after the first payment, the State CSBG Program processes subsequent payments monthly for eligible entities. The subsequent payments are fairly consistent, ensuring payment within 21 days of receiving an accurate payment request from an eligible entity.

If this is the first year filling out the automated State Plan, skip the following question.

7.5. Performance Management Adjustment: How is the State improving grant and/or contract administration procedures under this State Plan as compared to past plans? Any improvements should be based on analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the State is not making any improvements, provide further detail. **[Narrative, 2500 Characters]**

Note: This information is associated with State Accountability Measure 2Sb and may pre-populate the State's annual report form.

Administrative Funds [Section 675C(b)(2) of the CSBG Act]

7.6. What amount of State CSBG funds does the State plan to allocate for administrative activities, under this State Plan? The estimate may be in dollars or a percentage. **[Numeric response, specify \$ or %]**

Five (5) percent is allocated for administrative activities.

7.7. How many State staff positions will be funded in whole or in part with CSBG funds under this State Plan? **[Insert a number between 0 – 99]**

1 full time position and a varying number of other administration positions based on the State's cost allocation plan.

7.8. How many State Full Time Equivalents (FTEs) will be funded with CSBG funds under this State Plan? **[Insert a number between 0 – 99]**

1 full time position and a varying number of other administration positions based on the State's cost allocation plan.

Remainder/Discretionary Funds [Section 675C(b) of the CSBG Act]

7.9. Does the State have remainder/discretionary funds? Yes No

If yes was selected, describe how the State plans to use remainder/discretionary funds in the table below.

Note: This response will link to the corresponding assurance, item 14.2.

Instructional Note: The assurance under 676(b)(2) of the Act (item 14.2 of this State Plan) specifically requires a description of how the State intends to use remainder/discretionary funds to “support innovative community and neighborhood-based initiatives related to the purposes of [the CSBG Act].” Include this description in row “f” of the table below and/or attach the information.

If a funded activity fits under more than one category in the table, allocate the funds among the categories. For example, if the State provides funds under a contract with the State Community Action association to provide training and technical assistance to eligible entities and to create a statewide data system, the funds for that contract should be allocated appropriately between row a and row c. If allocation is not possible, the State may allocate the funds to the main category with which the activity is associated.

Note: This information is associated with State Accountability Measures 3Sa; the responses may pre-populate the State’s annual report form.

Use of Remainder/Discretionary Funds						
Remainder/ Discretionary Fund Uses	Year One (FY2015)		Year Two (FY2016) est		Brief description of services/activities	
	(See 675C(b)(1) of the CSBG Act)	Planned \$	Planned %	Planned \$		Planned %
a. Training/technical assistance to eligible entities		\$65,000	25%	\$36,000	15%	Agencies received additional money on their FY2015 subgrants to offset costs of training and technical assistance and training conferences
b. Coordination of State-operated programs and/or local programs		\$49,524	19%	\$49,500	21%	Nebraska contracts with Nebraska Children and Families Foundation to provide grant writing services (\$49,524) to

					statewide and local projects impacting CSBG programs or eligible entities
c. Statewide coordination and communication among eligible entities	\$120,000	45%	\$120,000	51%	Nebraska gives Community Action of Nebraska operational dollars for a system administrator position and a community outreach position to assist with statewide activities and training.
d. Analysis of distribution of CSBG funds to determine if targeting greatest need	\$0	0%	\$0	0%	
e. Asset-building programs	\$0	0%	\$0	0%	Community Action of Nebraska received AFI grant money so the state office does not contribute to these efforts
f. Innovative programs/ activities by eligible entities or other neighborhood groups	\$0	0%	\$0	0%	Due to ramping up for Organizational Standards and other eligible entity compliance issues, Nebraska did not contribute any money for innovative programs.

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g. State charity tax credits	\$0	0%	\$0	0%	Nebraska does not have state charity tax credits
h. Other activities, specify: Community Needs Assessment	\$30,000	11%	\$30,000	13%	Nebraska pays for Community Action of Nebraska to conduct a statewide needs assessment
Totals	\$264,524	100%	\$235,500	100%	
* amount is over FY2015 allotment due to carryover of 2014 discretionary and admin dollars					

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

- XCSBG eligible entities (if checked, include the expected number of CSBG eligible entities to receive funds) **[Narrative, 2500 characters]**
- X Other community-based organizations
- X State Community Action association
- Regional CSBG technical assistance provider(s)
- National technical assistance provider(s)
- X Individual consultant(s)
- Tribes and Tribal Organizations
- Other **[Narrative, 2500 characters]**
- None (the State will carry out activities directly)

Note: This response will link to the corresponding CSBG assurance, item 14.2.

The eligible entities at times receive discretionary money to offset costs of training and technical assistance. For example, in FY2015, discretionary money was given to each eligible entity to offset costs of attending OMB Super Circular Training, ROMA Task Force Training and Results Based Accountability training offered in state. Other national trainings such as Community Action Partnership or ROMA Trainer certifications were also allowable expenses under these dollars. Nebraska anticipates providing about \$4,000 per agency in FY2016 to offset costs of training and technical assistance around Organizational Standards, Procurement and ROMA Next Generation.

If this is the first year filling out the automated State Plan, skip the following question.

7.11. Performance Management Adjustment: How is the State adjusting the use of remainder/discretionary funds under this State Plan as compared to past plans? Any adjustment should be based on the State’s analysis of past performance, and should consider

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feedback from eligible entities, OCS, and other sources, such as the public hearing. If the State is not making any adjustments, provide further detail. **[Narrative, 2500 Characters]**

Note: This information is associated with State Accountability Measures 3Sb, and will pre-populate the State's annual report form.

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SECTION 8 State Training and Technical Assistance

8.1. Describe the State’s plan for delivering CSBG-funded training and technical assistance to eligible entities under this State Plan by completing the table below. Add a row for each activity; indicate the timeframe; whether it is training, technical assistance or both; and the topic. (CSBG funding used for this activity is referenced under item 7.9(a), Use of Remainder/Discretionary Funds.)

Note: 8.1 is associated with State Accountability Measure 3Sc and may pre-populate the State’s annual report form.

Training and Technical Assistance			
Fiscal Year (Y) Quarter (Q) / Timeframe	Training, Technical Assistance, or Both	Topic	Brief Description of “Other”
Dropdown options: <ul style="list-style-type: none"> • FY1 – Q1 • FY1 – Q2 • FY1 – Q3 • FY1 – Q4 	Toggle Options: <ul style="list-style-type: none"> NA NA NA NA Both Both Both 	Dropdown Options: <ul style="list-style-type: none"> NA NA NA NA Correcting Significant Deficiencies Among Eligible Entities Community Assessment Strategic Planning 	[Narrative, 2500 characters] FY2015 FY2015 FY2015 FY2015

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<ul style="list-style-type: none"> • FY2 – Q4 • Ongoing / Multiple Quarters • All quarters 	Both	<p>ROMA AND Organizational Standards for eligible entities with unmet standards on TAP or QIP plans</p> <p>Organizational Standards - General AND Reporting</p> <p>Monitoring AND Communication AND Governance/Tripartite Board</p>	
<p>ADD a ROW function Note: Rows will be able to be added for each additional training</p>			

8.1a. The planned budget for the training and technical assistance plan (as indicated in the Remainder/Discretionary Funds table in item 7.9): \$235,500_ **[Prepopulated with the budget allocation for years one and two under 7.9a]**

If this is the implementation year for organizational standards, skip question 8.2.

8.2. Does the State have in place Technical Assistance Plans (TAPs) or Quality Improvement Plans (QIPs) for all eligible entities with unmet organizational standards, if appropriate? Yes No

Note: 8.2 is associated with State Accountability Measure 6Sb. QIPs are described in Section 678C(a)(4) of the CSBG Act. If the State, according to their corrective action procedures, does not plan to put a QIP in place for an eligible entity with one or more unmet organizational standards, the State should put a TAP in place to support the entity in meeting the standard(s).

8.3. Indicate the types of organizations through which the State plans to provide training and/or technical assistance as described in item 8.1, and briefly describe their involvement? (Check all that apply.) **[Check all that applies and narrative where applicable]**

- CSBG eligible entities (if checked, provide the expected number of CSBG eligible entities to receive funds) **[Narrative, 2500 characters]**
- Other community-based organizations
- X State Community Action association
- X Regional CSBG technical assistance provider(s)
- X National technical assistance provider(s)
- X Individual consultant(s)
- Tribes and Tribal Organizations
- Other **[Narrative, 2500 characters]**

If this is the first year filling out the automated State Plan, skip the following question.

This version of the MSP is currently under review by OMB, which may result in additional edits.

8.4. Performance Management Adjustment: How is the State adjusting the training and technical assistance plan under this State Plan as compared to past plans? Any adjustment should be based on the State’s analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the State is not making any adjustments, provide further detail. **[Narrative, 2500 Characters]**

Note: This information is associated with State Accountability Measures 3Sd and may pre-populate the State’s annual report form.

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SECTION 9 State Linkages and Communication

Note: This section describes activities that the State may support with CSBG remainder/discretionary funds, described under Section 675C(b)(1) of the CSBG Act. The State may indicate planned use of remainder/discretionary funds for linkage/communication activities in Section 7, State Use of Funds, items 7.9(b) and (c).

9.1. State Linkages and Coordination at the State Level: Describe the linkages and coordination at the State level that the State plans to create or maintain to ensure increased access to CSBG services to low-income people and communities under this State Plan and avoid duplication of services (as required by the assurance under Section 676(b)(5)). Describe or attach additional information as needed. **[Check all that apply from the list below and provide a Narrative, 2500 Characters]**

Note: This response will link to the corresponding CSBG assurance, item 14.5. In addition, this item is associated with State Accountability Measure 7Sa and may pre-populate the State's annual report form.

State Low Income Home Energy Assistance Program (LIHEAP) office

State Weatherization office

State Temporary Assistance for Needy Families (TANF) office

State Head Start office

State public health office

State education department

State Workforce Innovation and Opportunity Act (WIOA) agency

State budget office

Supplemental Nutrition Assistance Program (SNAP)

State child welfare office

State housing office

Other

At this point, the State CSBG Program does not work closely with any of the programs listed above. The State CSBG Program defers other low income programs to work directly with the community action agencies. Throughout FY2016, Nebraska will work on collaborating more with these entities on a programmatic level.

However, Weatherization and CSBG do work together on some trainings to help grantees be compliant with OMB guidelines and provided training to all Weatherization and CSBG grantees in FY2014 and FY2015.

LIHEAP, SNAP, and TANF are housed in the same Economic Assistance Unit within Children and Family Services at Nebraska Department of Health and Human Services. The administrators may work together on joint projects and the administrators share the same director. As needed, programs will work together to meet client needs in the low income community.

Some homeless programs [Emergency Solutions Grant and Nebraska Homeless Assistance Program (NHAP)grant] are located within the Economic Assistance Unit as well.

NHAP, Refugee Resettlement, CSBG, Disabled Persons and Family Support and Respite are on the same team within Economic Assistance Unit and share the same supervisor. These programs work more closely than others but there is still improvement needed on the program level.

9.2. State Linkages and Coordination at the Local Level: Describe the linkages and coordination at the local level that the State plans to create or maintain with governmental and other social services, especially antipoverty programs, to assure the effective delivery of and coordination of CSBG services to low-income people and communities and avoid duplication of services (as required by assurances under Sections 676(b)(5) and (b)(6)). Attach additional information as needed. **[Narrative, 2500 Characters]**

Note: This response will link to the corresponding CSBG assurances, items 14.5 and 14.6.

At this point, the State CSBG Program does not work closely with any of the programs listed above. Throughout FY2016, Nebraska will work on collaborating more with these entities on a programmatic level.

However, Weatherization and CSBG do work together on some trainings to help grantees be compliant with OMB guidelines and provided training to all Weatherization and CSBG grantees in FY2014 and FY2015.

The State CSBG Program supports local agencies activities as much as possible either with training and technical assistance or with discretionary dollars as available. The grantwriting subgrant with Nebraska Children and Families Foundation allows discretionary dollars to support collaborative activities with other low income providers statewide or locally.

9.3. Eligible Entity Linkages and Coordination

9.3a State Assurance of Eligible Entity Linkages and Coordination: Describe how the State will assure that the eligible entities will coordinate and establish linkages to assure the effective delivery of and coordination of CSBG services to low-income people and communities and avoid duplication of services (as required by the assurance under

Section 676(b)(5)). Attach additional information as needed. **[Narrative, 2500 Characters]**

Note: This response will link to the corresponding CSBG assurance, item 14.5.

Attachment 9.3 -9.7 CSBG FY2016 Agency Application Narrative

Nebraska incorporated this question into the agency annual plan as shown in Attachment 9.3-9.7. In addition to requiring agencies to complete the narrative, linkages and coordination are discussed in the on site review. The State CSBG Program talks to staff and administration as well as the board about coordination.

9.3b State Assurance of Eligible Entity Linkages to Fill Service Gaps: Describe how the eligible entities will develop linkages to fill identified gaps in the services, through the provision of information, referrals, case management, and follow-up consultations, according to the assurance under Section 676(b)(3)(B) of the CSBG Act. **[Narrative, 2500 Characters]**

Note: This response will link to the corresponding CSBG assurance, item 14.3b.

Nebraska incorporated this question into the agency annual plan as shown in Attachment 9.3-9.7. In addition to requiring agencies to complete the narrative, gaps in services are discussed in the on site review. The gaps are also identified in each agency's community needs assessment that the State CSBG Program reviews. When discussing gaps in services, the State CSBG Program asks staff, administration and board what would they like to see the agency doing that it is currently not doing. The followup question is whether the agency is the best one to do it or are there other partners they work with that could do it better? These questions help the agency incorporate gaps in services, their current practices and partnerships into the discussion of how they are delivering services.

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

Note: This response will link to the corresponding CSBG assurance, item 14.5.

9.4a If the State selected "yes" under item 9.4, provide the CSBG-specific information included in the State's WIOA Combined Plan. This information includes a description of how the State and the eligible entities will coordinate the provision of employment and training activities through statewide and local WIOA workforce development systems. This information may also include examples of innovative employment and training

programs and activities conducted by community action agencies or other neighborhood-based organizations as part of a community antipoverty strategy. **[Narrative, 2500 Characters]**

NA

9.4b. If the State selected “no” under item 9.4, describe the coordination of employment and training activities, as defined in Section 3 of WIOA, by the State and by eligible entities providing activities through the WIOA system. **[Narrative, 2500 Characters]**

At this time, the State CSBG Program is not coordinating activities with WIOA and the Department of Labor who oversees WIOA as designated by the Governor. Throughout FY2016, Nebraska will work to seek opportunities for coordination at the program level.

9.5. Emergency Energy Crisis Intervention: Describe how the State will assure, where appropriate, that emergency energy crisis intervention programs under title XXVI (relating to Low-Income Home Energy Assistance) are conducted in each community in the State, as required by the assurance under Section 676(b)(6) of the CSBG Act). **[Narrative, 2500 Characters]**

Note: This response will link to the corresponding CSBG assurance, item 14.6.

The LIHEAP program is also operated under the Economic Assistance Unit of Nebraska Department of Health and Human Services. Administrators work together and the programs are under the same unit within DHHS so share a Director. The LIHEAP program staff are responsible for meeting LIHEAP assurances. The State CSBG Program will work throughout FY2016 to improve opportunities for coordination on the programmatic level for statewide assistance.

Currently, LIHEAP partners with 7 of the 9 eligible entities and provides additional LIHEAP dollars to the Weatherization program which is operated at 7 of the 9 eligible entities.

9.6. State Assurance: Faith-based Organizations, Charitable Groups, Community Organizations: Describe how the State will assure local eligible entities will coordinate and form partnerships with other organizations, including faith-based organizations, charitable groups, and community organizations, according to the State’s assurance under Section 676(b)(9) of the CSBG Act. **[Narrative, 2500 characters OR attach a document]**

Note: this response will link to the corresponding assurance, item 14.9

Nebraska incorporated this question into the agency annual plan as shown in Attachment 9.3-9.7. In addition to requiring agencies to complete the narrative, partnerships are discussed in the on site review. Each eligible entity has numerous partnerships that include faith based, charitable groups and other community partners. Partnerships are also reviewed as part of the on site review process. Finally, agencies are required to list partners and affiliations and relationships on the annual Community Services Block Grant Information Services report.

9.7 Coordination of Eligible Entity 90 Percent Funds with Public/Private Resources: Describe how the eligible entities will coordinate CSBG 90 percent funds with other public and private resources, according to the assurance under Section 676(b)(3)(C) of the CSBG Act. **[Narrative, 2500 Characters]**

Note: this response will link to the corresponding assurance, item 14.3c.

Nebraska incorporated this question into the agency annual plan as shown in Attachment 9.3-9.7. In addition to requiring agencies to complete the narrative, leveraging funds is discussed in the on site review. Agencies are also required to submit their public and private dollars received on the annual Community Services Block Grant Information Services report. The State CSBG Program reviews the annual CSBG-IS report and compiles data around the leveraged dollars. The information is shared individually with each agency and reported as an aggregate to the network. Since Nebraska collaborates with the State Association on the CSBG-IS report, we are able to do evaluation of leveraging and identify strengths and weaknesses for training and technical assistance.

9.8. Coordination among Eligible Entities and State Community Action Association: Describe State activities for supporting coordination among the eligible entities and the State Community Action Association. **[Narrative, 2500 Characters]**

Nebraska provides discretionary money to the State Community Action Association to coordinate outreach and training and technical assistance activities statewide. The State also provides funding to the Association to work with the eligible entities in coordinating and completing the IS report. The Association and State CSBG Program have a good working relationship and meet regularly to discuss eligible entity needs. Both the state and association participate in the RPIC and continue to improve activities under that grant.

9.9 Communication with Eligible Entities and the State Community Action Association: In the table below, describe the State's plan for communicating with eligible entities, the State Community Action Association, and other partners under this State Plan. Include communication about annual hearings and legislative hearings, as described under Section 4, CSBG Hearing Requirements.

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Communication Plan			
Topic	Expected Frequency	Format (drop down)	Brief Description of "Other"
[Narrative, 2500 characters]	Dropdown Options:	Dropdown Options:	[Narrative, 2500 characters]
Funding Opportunities to expand or new programs	Other	Email	As opportunities come up from Listserves or NCFE subgrant explained in Discretionary line
Update on CSBG State Activities	Monthly	Meetings/Presentation	As part of CAN (state association) meetings
CSBG Annual Plan	Semi Annually	Email AND Website AND Meetings/presentation	IN FY2016, CSBG will work more closely with agencies to complete FY2017-18 plan.
ROMA updates	Semi Annually	Email	Expect more contact as ROMA Next Gen rolls out
Training and technical assistance	Daily	Email AND Meetings/presentation	This is done as needed and as information becomes available
State RFA updates of interest	Other	Website	As needed when state grants of interest come up
Review of Financial Reports	Quarterly	Email	
Legislative Hearing	Annually	Email	They are notified of the date, time and location of the legislative hearing and encouraged to attend
Public Hearing on State Plan	Annually	Email	They are notified of the date, time and location of the public hearing and encouraged to attend
Discussion of eligible entities annual application	Quarterly	Meetings/Presentation	IN FY2016, CSBG will seek input on the submitted eligible entity plans and make changes for FY2017.
ADD a ROW function Note: As many rows that are needed will be able to be added			

9.10. Feedback to Eligible Entities and State Community Action Association: Describe how the State will provide feedback to local entities and State Community Action Associations regarding performance on State Accountability Measures. **[Narrative, 2500 Characters]**

Note: This information is associated with State Accountability Measure 5S(iii). The measure indicates feedback should be provided within 60 calendar days of the State getting feedback from OCS.

The State CSBG Program will present its results on the State Accountability Measures at an in person Community Action of Nebraska (CAN) meeting. The association meets in person every other month, so meeting the 60 calendar day requirement stated above is possible in this arrangement.

If Nebraska did not meet a State Accountability Measure it will provide to the network a plan to meet that measure in the next evaluation. If it is an Accountability Measure that cannot be met by the state, the office will provide information on why and what is needed to meet that measure. In some cases, until decision and changes are made, State of Nebraska policies and procedures or state regulations and laws may prevent the state from meeting a measure. The

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most obvious example is timely payments to eligible entities and the constraints of state policy around subgranting

If this is the first year filling out the automated State Plan, skip the following question.

9.11. Performance Management Adjustment: How is the State adjusting the Communication plan in this State Plan as compared to past plans? Any adjustment should be based on the State's analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the State is not making any adjustments, provide further detail. **[Narrative, 2500 Characters]**

Note: This information is associated with State Accountability Measures 7Sb; this response may pre-populate the State's annual report form.

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SECTION 10 Monitoring, Corrective Action, and Fiscal Controls

Monitoring of Eligible Entities (Section 678B(a) of the CSBG Act)

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

This is an estimated schedule to assist States in planning. States may indicate “no review” for entities the State does not plan to monitor in the performance period.

For States that have a monitoring approach that does not fit within the table parameters, attach the State’s proposed monitoring schedule.

Note: This information is associated with State Accountability Measure 4Sa(i); this response may pre-populate the State’s annual report form.

CSBG Eligible Entity	Review Type	Target Date	Date of Last Full Onsite Review (if applicable)	Brief Description of “Other”
Will auto-populate from item 5.1	Dropdown Options:	Dropdown Options:	Select a date	[Narrative, 2500 characters]
				All will be evaluated on Organizational Standards in FY2016
Blue Valley Community Action (BVCA)	Full Onsite	FY2 Q4	Feb-14	
Community Action Partnership of Lancaster and Saunders Counties (CAPLSC)	No review	NA	Mar-15	
Community Action Partnership of Western Nebraska (CAPWN)	Full Onsite	FY2 Q1	Jan-15	
Central Nebraska Community Services (CNCS)	Other	FY2 Q1	Apr-14	This entity has a new Executive Director so will receive a modified full on site review
Eastern Nebraska Community Action Partnership (ENCAP)	Full Onsite	FY2 Q2	Apr-15	
Community Action Partnership of Mid Nebraska (Mid)	No review	NA	Aug-15	
Northwest Community Action Partnership (NCAP)	No review	NA	Sept-15	

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Northeast Nebraska Community Action Partnership (NENCAP)	No review	NA	May-15	
Southeast Nebraska Community Action Partnership (SENCAP)	Full Onsite	FY2 Q3	Sep-13	

10.2. Monitoring Policies: Provide a copy of State monitoring policies and procedures by attaching and/or providing a hyperlink. **[Attach a document or add a link]**

The State CSBG Program does not have written monitoring policies and procedures. They will be completed in by January 2016.

The State CSBG Program has onsite monitoring tools that are included in Attachment 10.2.

The following language for financial reviews as part of the CSBG subgrant with eligible entities:

III. STATEMENT OF WORK

A. The Subrecipient shall:

2. Submit the following data, program, and financial reports to DHHS according to the reporting requirements.

b. Complete quarterly reports with expenditures by line item are due, for any quarter where funds are expended, on the following dates:

Quarterly
January 31
April 30
July 31
November 30

Quarterly reports will be corrected as needed based on DHHS review of quarterly reports for accuracy.

DHHS will verify DHHS selected line items in no less than two (2) quarterly reports for each subgrantee. DHHS reserves the right to test any expenditures per reporting period for verification of expenses, and adherence to subrecipient financial policies and procedures. The subrecipient shall provide additional documentation to DHHS for the line items DHHS identifies to be tested to check the sample of quarterly expenditures.

10.3. Initial Monitoring Reports: According to the State’s procedures, by how many calendar days must the State disseminate initial monitoring reports to local entities? **[Insert a number from 1 – 100]**

Note: This item is associated with State Accountability Measure 4Sa(ii) and may pre-populate the State’s annual report form.

The State CSBG Program issues letters within 45 days of completing the onsite review. In some situations, where an eligible entity may be considered for dedesignation the letter may take longer due to internal State policies requiring the involvement of additional management in the decision making process.

Corrective Action, Termination and Reduction of Funding and Assurance Requirements (Section 678C of the Act)

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

10.4a. If no, describe State procedures for addressing eligible entity findings/deficiencies, and the documenting of closure of findings. **[Narrative, 2500 characters]**

After an on site review the agency receives a letter containing the following headings:

- Strengths
- Deficiencies
- Compliance Issues
- Recommendations.

Deficiencies and Compliance Issues are considered findings and will put an agency into a Quality Improvement Plan (QIP) until those deficiencies and compliance issues are resolved.

The agency has 60 days from date of letter to provide a QIP to the -State- The State Office will review and either accept or deny the plan within 30 days of receipt. If denied the State will provide clarification on what was not acceptable and the agency may be given the opportunity to resubmit a plan. Nebraska has not had an instance where an agency had to submit more than two plans. In all cases, the second plan has been accepted. If the State has determined training and technical assistance or a quality improvement plan are not appropriate the State will notify the Secretary of Health and Human Services (per 10.6 below) and the agency.

The agency is required to list the activities or processes they will do to fix the deficiency or compliance issue. They must also provide a timeline for completion.

The State reevaluates the Deficiencies and/or Compliance issues on an ongoing basis and does a recheck within 12 months of the findings. Once the State determined the agency has resolved the deficiencies the State will notify the agency in writing.

Recommendations are based on best practices and are not considered significant enough for a finding. Recommendations are followed up on at the next on site review. Agencies do not have to act on the recommendations and adopt them, they must document that they took them under advisement and decided not to act on the recommendation.

10.5. Quality Improvement Plans (QIPs): How many eligible entities are currently on Quality Improvement Plans? [Numeric, 3 digits]

Note: The QIP information is associated with State Accountability Measures 4Sc.

There are two (2) agencies currently under a Quality Improvement Plan.

10.6. Reporting of QIPs: Describe the State's process for reporting eligible entities on QIPs to the Office of Community Services within 30 calendar days of the State approving a QIP? **[Narrative, 2500 characters]**

Note: This item is associated with State Accountability Measure 4Sa(iii).

Nebraska emails the regional representative to let him know that an agency has been placed under a Quality Improvement Plan (QIP). If the agency is having difficulty and the State is looking for assistance, it will share the on site review letter with the regional OCS representative.

Most QIPs are corrected within a year. For those cases that continue on, Nebraska updates the regional OCS representative after each major action.

Most if not all communication is through email.

10.7. Assurance on Funding Reduction or Termination: Does the State assure, according to Section 676(b)(8), that "any eligible entity that received CSBG funding the previous fiscal year will not have its funding terminated or reduced below the proportional share of funding the entity received in the previous fiscal year unless, after providing notice and an opportunity for a hearing on the record, the State determines that cause exists for such termination or such reduction, subject to review by the Secretary as provided in Section 678C(b)." X Yes No

Note: This response will link with the corresponding assurance under item 14.8.

Policies on Eligible Entity Designation, De-designation, and Re-designation

10.8. Does the State CSBG statute and/or regulations provide for the designation of new eligible entities? X Yes No

10.8a. If yes, provide the citation(s) of the law and/or regulation. If no, describe State procedures for the designation of new eligible entities. **[Narrative, 2500 Characters]**

Title 481

10.9. Does the State CSBG statute and/or regulations provide for de-designation of eligible entities? X Yes No

10.9a. If yes, provide the citation(s) of the law and/or regulation. If no, describe State procedures for de-designation of new eligible entities. **[Narrative, 2500 Characters]**

Title 481

10.10. Does the State CSBG statute and/or regulations specify a process the State CSBG agency must follow to re-designate an existing eligible entity? Yes No

This version of the MSP is currently under review by OMB, which may result in additional edits.

10.10a. If yes, provide the citation(s) of the law and/or regulation. If no, describe State procedures for re-designation of existing eligible entities. **[Narrative, 2500 Characters]**

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Fiscal Controls and Audits and Cooperation Assurance

- 10.11. Fiscal Controls and Accounting:** Describe how the State’s fiscal controls and accounting procedures will a) permit preparation of the SF-425 Federal fiscal reports (FFR) and b) permit the tracing of expenditures adequate to ensure funds have been used appropriately under the block grant, as required by Block Grant regulations applicable to CSBG at 45 CFR 96.30(a).
[Narrative, 2500 Characters or attach a document]

Please see attachment 10.11. In FY2015, Grants Management instituted a policy where Program staff sign off on the SF-425 prior to submission to the federal funder. All expenses are matched to the accounting system within DHHS and double checked by program staff. Program staff also review invoices for allowability of expenses as well as perform financial desk audits as previously discussed, with records kept in the State’s electronic payment system and/or agency files.

- 10.12. Single Audit Management Decisions:** Describe State procedures for issuing management decisions for eligible entity single audits, as required by Block Grant regulations applicable to CSBG at 45 CFR 75.521. If these procedures are described in the State monitoring protocols attached under item 10.2, indicate the page number. **[Narrative, 2500 Characters]**

Note: This information is associated with State Accountability Measure 4Sd.

Please see attachment 10.12 for the Subrecipient Monitoring Policy.

- 10.13. Assurance on Federal Investigations:** Will the State “permit and cooperate with Federal investigations undertaken in accordance with Section 678D” of the CSBG Act, as required by the assurance under Section 676(b)(7) of the CSBG Act? X Yes No

Note: This response will link with the corresponding assurance, item 14.7

If this is the first year filling out the automated State Plan, skip the following question.

- 10.14. Performance Management Adjustment:** How is the State adjusting monitoring procedures in this State Plan as compared to past plans? Any adjustment should be based on the State’s analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If this State is not making any adjustments, provide further detail. **[Narrative, 2500 Characters]**

Note: This item is associated with State Accountability Measure 4Sb and may pre-populate the State’s annual report form.

SECTION 11 Eligible Entity Tripartite Board

- 11.1.** Which of the following measures are taken to ensure that the State verifies CSBG Eligible Entities are meeting Tripartite Board requirements under Section 676B of the CSBG Act? **[Check all that applies and narrative where applicable]**

Attend Board meetings

X Review copies of Board meeting minutes

X Track Board vacancies/composition

Other **[Narrative, 2500 characters]**

- 11.2.** How often does the State require eligible entities (which are not on TAPs or QIPs) to provide updates (e.g., copies of meeting minutes, vacancy alerts, changes to bylaws, low-income member selection process, etc.) regarding their Tripartite Boards? **[Check all that applies and narrative where applicable]**

Annually

X Semiannually

X Quarterly

X Monthly

X Other **[Narrative, 2500 characters]**

Nebraska requires agencies to update board changes and vacancy alerts of major staff positions within a week of the occurrence. Each entity provides their board packets within two weeks of the board meeting per the subgrant agreement.

Changes to bylaws and low income process changes or any policy and procedures changes are documented at the next on site review. The on site prework requires agencies to provide updated policies and procedures and bylaws highlighting any changes from the previous on site review. See Attachment 10.2 for more information on the prework document.

Board packet reviews will also provide some changes and those are documented in the desk audit paperwork in their FY file.

- 11.3. Assurance on Eligible Entity Tripartite Board Representation:** Describe how the State will carry out the assurance under Section 676(b)(10) of the CSBG Act that the State will require eligible entities to have policies and procedures by which individuals or organizations can petition for adequate representation on an eligible entities' Tripartite Board. **[Narrative, 2500 Characters]**

Note: This response will link with the corresponding assurance, item 14.10.

The State includes this requirement as part of the onsite review process. Policies and procedures are reviewed prior to the onsite review to ensure the language is in the policy.

- 11.4.** Does the State permit public eligible entities to use, as an alternative to a Tripartite Board, “another mechanism specified by the State to assure decision-making and participation by low-income individuals in the development, planning, implementation, and evaluation of programs” as allowed under Section 676B(b)(2) of the CSBG Act. Yes No

11.4a. If yes, describe the mechanism used by public eligible entities as an alternative to a Tripartite Board. **[Narrative, 2500 Characters]**

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Section 12 Individual and Community Income Eligibility Requirements

12.1. Required Income Eligibility: What is the income eligibility threshold for services in the State? **[Check one item below.]**

125% of the HHS poverty line

- % of the HHS poverty line (fill in the threshold): _____% **[insert up to a 3 digit percentage]**
- X Varies by eligible entity

12.1a. Describe any State policy and/or procedures for income eligibility, such as treatment of income and family/household composition. **[Narrative, 2500 Characters, or attachment]**

Nebraska does not have a specific policy or procedure relating to income eligibility separate from the language contained in the CSBG Act.

If CSBG funds are used for client services then income eligibility is limited to 125% HHS poverty line per CSBG Act. For services funded by other funders, that funding source determines income eligibility.

12.2. Income Eligibility for General/Short Term Services: For services with limited in-take procedures (where individual income verification is not possible or practical), how does the State ensure eligible entities generally verify income eligibility for services? An example of these services is emergency food assistance. **[Narrative, 2500 Characters]**

Nebraska incorporated this question into the FY2016 agency annual application and can be found in Attachment 9.3 – 9.7.

Since Nebraska does not have any restrictions on CSBG funding other than what is contained in the CSBG Act, we have limited influence on income verification. However, CSBG dollars are rarely used in Nebraska for direct client services. Much of the grant is spent on staff and infrastructure so the agency can deliver services with other public or private dollars. In Nebraska roughly \$60,000 of the \$4.2 million CSBG dollars allotted to grantees are for direct service. During the on site review, the State CSBG Program does a Client file review and a Financial Eligibility check. These reviews are checking whether income was verified not that the income met the funder criteria for service. Once completed (usually 25 to 30 random files for each agency), the information is shared with the agency for their review. Because CSBG funds are not normally used for direct services, the State CSBG Program cannot determine whether the agency adhered to the funding rules of the funding agency. It can only suggest best practices. The funders assure their program requirements are in compliance.

12.3. Community-targeted Services: For services that provide a community-wide benefit (e.g., development of community assets/facilities, building partnerships with other organizations),

how does the State ensure eligible entities' services target and benefit low-income communities? **[Narrative, 2500 Characters]**

Nebraska incorporated this question into the FY2016 agency annual application and can be found in Attachment 9.3 – 9.7.

The State CSBG Program reviews this information as part of the on site review. In discussions with Administration and Board members the focus is on how these community activities help the low income community. In most cases, both administration and the board can identify the results and outcomes of these community wide programs and that they help the low income community more even if the low income numbers of clients are smaller for those programs.

Overall, most of the agencies have programs with a community wide benefit. In review of the FY2016 applications received, agencies base their decisions to partner or lead community wide efforts based on their community needs assessment. These identified needs affect the low income community in greater numbers than the more affluent areas. Also, community action agencies in Nebraska are recognized state wide as valuable partners in addressing low income populations, so partnerships and community wide benefit programs where community action agencies are at the table have already made the assumption that low income people have the need.

DRAFT

SECTION 13

Results Oriented Management and Accountability (ROMA) System

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

Note: This response will also link to the corresponding assurance, item 14.12.

X The Results Oriented Management and Accountability (ROMA) System

Another performance management system that meets the requirements of section 678E(b) of the CSBG Act

X An alternative system for measuring performance and results

13.1a. If ROMA was selected in item 13.1, attach and/or describe the State's written policies, procedures, or guidance documents on ROMA. **[Attachment and Narrative, 2500 characters]**

Nebraska does not have written policies and procedures for CSBG. These will be completed by January 2016. It will update relevant ROMA information within six (6) months of finalization of ROMA Next Generation.

13.1b. If ROMA was not selected in item 13.1, describe the system the State will use for performance measurement. **[Narrative, 2500 characters]**

Nebraska selected other as well, because we are looking at Marc Friedman's Results Based Accountability as an alternate way for agencies to evaluate their outcomes. Agencies will still report using the ROMA language and format but this process may be complementary to ROMA and help front line staff understand outcomes better.

NDHHS started implementation of Results Based Accountability in 2012 and incorporates some strategies in its subgrant and contracting processes.

13.2. Indicate and describe the outcome measures the State will use to measure eligible entity performance in promoting self-sufficiency, family stability, and community revitalization, as required under Section 676(b)(12) of the CSBG Act? **[Check one and Narrative, 2500 characters]**

Note: This response will also link to the corresponding assurance, item 14.12.

X CSBG National Performance Indicators (NPIs)

NPIs and others

Others

Nebraska will use the existing NPIs listed under Goal 1 for self sufficiency, Goal 2 for community revitalization and Goal 6 for family stability.

- 13.3.** How does the State support the eligible entities in using the ROMA system (or alternative performance measurement system)? **[Narrative, 2500 characters or attach a document]**

Note: The activities described under item 13.3 may include activities listed in “Section 8: Training and Technical Assistance.” If so, mention briefly, and/or cross-reference as needed. This response will also link to the corresponding assurance, item 14.12.

The State CSBG Program provides a subgrant to Community Action of Nebraska to employ a full time System Administrator to help the eligible entities with compliance with ROMA. The State also subgrants with Community Action of Nebraska to provide training and technical assistance, which may include assistance with ROMA goals and outcomes if needed. The CSBG State Office-also provides support for the ROMA Task Force that meets twice a year to review ROMA and provide best practices among agencies.

Agencies are also expected to employ an Agency Administrator whose job is to oversee the data collection of ROMA outcomes and reporting.

- 13.4. Eligible Entity Use of Data:** How is the State validating that the eligible entities are using data to improve service delivery? **[Narrative, 2500 characters or attach a document]**

Note: This response will also link to the corresponding assurance, item 14.12.

Nebraska incorporated this evaluation into the FY2016 agency applications for funding. The State in partnership with the association and eligible entities will look at improving this for FY2017 and over time.

Community Action Plans and Needs Assessments

- 13.5.** Describe how the State will secure a Community Action Plan from each eligible entity, as a condition of receipt of CSBG funding by each entity, as required by Section 676(b)(11) of the CSBG Act. **[Narrative, 2500 characters or attach a document]**

Note: this response will link to the corresponding assurance, item 14.11.

Nebraska requires agencies to submit an annual application for funding. Please see Attachment 9.3-9.7 for the application narrative.

- 13.6. State Assurance:** Describe how the State will assure that each eligible entity includes a community needs assessment for the community served (which may be coordinated with community needs assessments conducted by other programs) in each entity’s Community Action Plan, as required by Section 676(b)(11) of the CSBG Act. **[Narrative, 2500 characters or attach a document]**

Note: this response will link to the corresponding assurance, item 14.11.

This version of the MSP is currently under review by OMB, which may result in additional edits.

Nebraska includes a question on the annual application asking the eligible entity to address how they use the community needs assessment to dictate the services they provide. Please see attachment 9.3 -9.7 for the application narrative.

Nebraska requires completion of a community needs assessment as identified in the CSBG Act. Language is included in all subgrants to eligible entities explaining that this must be completed.

Nebraska also provides discretionary money to complete a Statewide Community Needs Assessment that the eligible entities can use as a secondary source for their community needs assessment.

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SECTION 14

CSBG Programmatic Assurances and Information Narrative (Section 676(b) of the CSBG Act)

14.1 Use of Funds Supporting Local Activities

CSBG Services

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

- (A) to support activities that are designed to assist low-income families and individuals, including families and individuals receiving assistance under title IV of the Social Security Act, homeless families and individuals, migrant or seasonal farmworkers, and elderly low-income individuals and families, and a description of how such activities will enable the families and individuals--
 - (i) to remove obstacles and solve problems that block the achievement of self-sufficiency (particularly for families and individuals who are attempting to transition off a State program carried out under part A of title IV of the Social Security Act);
 - (ii) to secure and retain meaningful employment;
 - (iii) to attain an adequate education with particular attention toward improving literacy skills of the low-income families in the community, which may include family literacy initiatives;
 - (iv) to make better use of available income;
 - (v) to obtain and maintain adequate housing and a suitable living environment;
 - (vi) to obtain emergency assistance through loans, grants, or other means to meet immediate and urgent individual and family needs;
 - (vii) to achieve greater participation in the affairs of the communities involved, including the development of public and private grassroots partnerships with local law enforcement agencies, local housing authorities, private foundations, and other public and private partners to –
 - (I) document best practices based on successful grassroots intervention in urban areas, to develop methodologies for widespread replication; and
 - (II) strengthen and improve relationships with local law enforcement agencies, which may include participation in activities such as neighborhood or community policing efforts;

[Narrative, 2500 or attach a document]

Nebraska requires each agency to submit an annual application. Please see attachment 9.3-9.7 for application narrative.

In review of FY2016 agency applications received, all agencies are meeting these requirements in services to their local areas.

These assurances are also written into each agency subgrant.

In addition as part of the onsite review, the State CSBG Program reviews this information through interviews, case file reviews, board packet reviews and other reports.

Needs of Youth

14.1b. 676(b)(1)(B) Describe how the State will assure “that funds made available through grant or allotment will be used –

- (B) to address the needs of youth in low-income communities through youth development programs that support the primary role of the family, give priority to the prevention of youth problems and crime, and promote increased community coordination and collaboration in meeting the needs of youth, and support development and expansion of innovative community-based youth development programs that have demonstrated success in preventing or reducing youth crime, such as--
 - (i) programs for the establishment of violence-free zones that would involve youth development and intervention models (such as models involving youth mediation, youth mentoring, life skills training, job creation, and entrepreneurship programs); and
 - (ii) after-school child care programs;

[Narrative, 2500 characters OR attach a document]

Nebraska requires each agency to submit an annual application. Please see attachment 9.3-9.7 for application narrative.

These assurances are also written into each agency subgrant.

In addition as part of the onsite review, the State CSBG Program reviews this information-through interviews, case file reviews, board packet reviews and other reports.

In reviewing the received FY2016 applications, all agencies work with youth in some manner. In 7 of the 9 agencies, Head Start and/or Early Head Start is a key program meeting this requirement. For the 2 agencies that do not have Head Start one works closely with runaway and at risk youth and the other runs an afterschool program targeting at risk youth.

All agencies go beyond Head Start to ensure that youth services are a focus of their activities.

Coordination of Other Programs

14.1c. 676(b)(1)(C) Describe how the State will assure “that funds made available through grant or allotment will be used –

- (C) to make more effective use of, and to coordinate with, other programs related to the purposes of this subtitle (including State welfare reform efforts)

[Narrative, 2500 characters OR attach a document]

Nebraska requires each agency to submit an annual application. Please see attachment 9.3-9.7 for application narrative.

These assurances are also written into each agency subgrant.

In addition as part of the onsite review, the State CSBG Program reviews this information through interviews, case file reviews, board packet reviews and other reports.

In review of received FY2016 applications, all agencies coordinate with other programs to meet their goals and outcomes. Since CSBG is used primarily for staff and infrastructure support it is imperative to have other program funds either private or public to meet client needs.

State Use of Discretionary Funds

14.2 676(b)(2) Describe “how the State intends to use discretionary funds made available from the remainder of the grant or allotment described in section 675C(b) in accordance with this subtitle, including a description of how the State will support innovative community and neighborhood-based initiatives related to the purposes of this subtitle.”

Note: the State describes this assurance under “State Use of Funds: Remainder/Discretionary,” items 7.9 and 7.10

[No response; links to items 7.9 and 7.10.]

Eligible Entity Service Delivery, Coordination, and Innovation

14.3. 676(b)(3) “Based on information provided by eligible entities in the State, a description of...”

Eligible Entity Service Delivery System

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

[Narrative, 2500 characters OR attach a document]

Nebraska requires each agency to submit an annual application. Please see attachment 9.3-9.7 for application narrative.

In review of the received FY2016 agency applications, all agencies do a combination of one time services and case management services. In Nebraska, there has been an effort over the last few years for agencies to focus more on case management than one time assistance. However, in order to meet low income people's needs, there are some programs that must be maintained as a one time assistance with no further contact with the client. Different funding sources have different eligibility and assistance requirements that make one model of service delivery difficult for community action agencies.

Eligible Entity Linkages – Approach to Filling Service Gaps

14.3b. 676(b)(3)(B) Describe “how linkages will be developed to fill identified gaps in the services, through the provision of information, referrals, case management, and followup consultations.”

Note: the State describes this assurance in the State Linkages and Communication section, item 9.3b.

[No response; links to 9.3b.]

Coordination of Eligible Entity Allocation 90 Percent Funds with Public/Private Resources

14.3c. 676(b)(3)(C) Describe how funds made available through grants made under 675C(a) will be coordinated with other public and private resources.”

Note: the State describes this assurance in the State Linkages and Communication section, item 9.7.

[No response; links to 9.7]

Eligible Entity Innovative Community and Neighborhood Initiatives, Including Fatherhood/Parental Responsibility

14.3d. 676(b)(3)(D) Describe “how the local entity will use the funds [made available under 675C(a)] to support innovative community and neighborhood-based initiatives related to the purposes of this subtitle, which may include fatherhood initiatives and other initiatives with the goal of strengthening families and encouraging parenting.”

Note: The description above is about eligible entity use of 90 percent funds to support these initiatives. States may also support these types of activities at the local level using State remainder/discretionary funds, allowable under Section 675C(b)(1)(F). In this State Plan, the State indicates funds allocated for these activities under item 7.9(f).

[Narrative, 2500 characters OR attach a document]

Nebraska requires each agency to submit an annual application. Please see attachment 9.3-9.7 for application narrative.

At this time no agency is doing a fatherhood initiative.

However, many agencies are conducting programs around parental responsibility. One agency incorporated parental training into its youth services program. They determined that in addition to serving the youth in their youth center, they needed to target programming to parents. They now require parents to complete training.

Head Start and Early Head Start have strong programs encouraging parental involvement and strengthening families.

Another agency has a home visiting program that targets parents of newborn to three years old.

Each agency will address strengthening families and encouraging parenting if that is an issue that arises in client discussions. Since agencies are moving more to a case management model, the client determines goals. If that goal includes parenting, the agency will work with the client to get those services.

Eligible Entity Emergency Food and Nutrition Services

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

[Narrative, 2500 characters OR attach a document]

Nebraska requires each agency to submit an annual application. Please see attachment 9.3-9.7 for application narrative.

These assurances are also written into each agency subgrant.

In addition as part of the onsite review, the State CSBG Program reviews this information through interviews, case file reviews, board packet reviews and other reports.

In review of the received FY2016 agency applications, all agencies do programming around food insecurity. It includes food pantries, partnership with the state or local businesses for food distribution, back pack programs for weekend food needs and running meal services.

State and Eligible Entity Coordination/linkages and Workforce Innovation and Opportunity Act Employment and Training Activities

- 14.5. 676(b)(5)** Describe how the State will assure “that the State and eligible entities in the State will coordinate, and establish linkages between, governmental and other social services programs to assure the effective delivery of such services, and [describe] how the State and the eligible entities will coordinate the provision of employment and training activities, as defined in section 3 of the Workforce Innovation and Opportunity Act, in the State and in communities with entities providing activities through statewide and local workforce development systems under such Act.”

Note: The State describes this assurance in the State Linkages and Communication section, items 9.1, 9.2, 9.3a, 9.4, 9.4a, and 9.4b.

[No response; links to items 9.1, 9.2, 9.3a, 9.4, 9.4a, and 9.4b]

State Coordination/Linkages and Low-income Home Energy Assistance

- 14.6. 676(b)(6)** Provide “an assurance that the State will ensure coordination between antipoverty programs in each community in the State, and ensure, where appropriate, that emergency energy crisis intervention programs under title XXVI (relating to low-income home energy assistance) are conducted in such community.”

Note: The State describes this assurance in the State Linkages and Communication section, items 9.2 and 9.5.

[No response; links to 9.2 and 9.5]

Federal Investigations

- 14.7. 676(b)(7)** Provide “an assurance that the State will permit and cooperate with Federal investigations undertaken in accordance with section 678D.”

Note: the State addresses this assurance in the Fiscal Controls and Monitoring section, item 10.13.

[No response; links to 10.13]

Funding Reduction or Termination

- 14.8. 676(b)(8)** Provide “an assurance that any eligible entity in the State that received funding in the previous fiscal year through a community services block grant made under this subtitle will not have its funding terminated under this subtitle, or reduced below the proportional share of funding the entity received in the previous fiscal year unless, after providing notice and an opportunity for a hearing on the record, the State determines that cause exists for such termination or such reduction, subject to review by the Secretary as provided in section 678C(b).”

Note: the State addresses this assurance in the Fiscal Controls and Monitoring section, item 10.7.

[No response; links to 10.7]

Coordination with Faith-based Organizations, Charitable Groups, Community Organizations

14.9. 676(b)(9) Describe how the State will assure “that the State and eligible entities in the State will, to the maximum extent possible, coordinate programs with and form partnerships with other organizations serving low-income residents of the communities and members of the groups served by the State, including religious organizations, charitable groups, and community organizations.”

Note: the State describes this assurance in the State Linkages and Communication section, item 9.6.

[No response; links to 9.6]

Eligible Entity Tripartite Board Representation

14.10. 676(b)(10) Describe how “the State will require each eligible entity in the State to establish procedures under which a low-income individual, community organization, or religious organization, or representative of low-income individuals that considers its organization, or low-income individuals, to be inadequately represented on the board (or other mechanism) of the eligible entity to petition for adequate representation.”

Note: the State describes this assurance in the Eligible Entity Tripartite Board section, 11.3

[No response; links to item 11.3]

Eligible Entity Community Action Plans and Community Needs Assessments

14.11. 676(b)(11) Provide “an assurance that the State will secure from each eligible entity in the State, as a condition to receipt of funding by the entity through a community services block grant made under this subtitle for a program, a community action plan (which shall be submitted to the Secretary, at the request of the Secretary, with the State plan) that includes a community-needs assessment for the community served, which may be coordinated with community-needs assessments conducted for other programs.”

[No response; links to items 13.5 and 13.6]

State and Eligible Entity Performance Measurement: ROMA or Alternate system

This version of the MSP is currently under review by OMB, which may result in additional edits.

14.12. 676(b)(12) Provide “an assurance that the State and all eligible entities in the State will, not later than fiscal year 2001, participate in the Results Oriented Management and Accountability System, another performance measure system for which the Secretary facilitated development pursuant to section 678E(b), or an alternative system for measuring performance and results that meets the requirements of that section, and [describe] outcome measures to be used to measure eligible entity performance in promoting self-sufficiency, family stability, and community revitalization.”

Note: The State describes this assurance in the ROMA section, items 13.1, 13.2, 13.3, and 13.4.

[No response; links to 13.1, 13.2, 13.3, and 13.4]

Validation for CSBG Eligible Entity Programmatic Narrative Sections

14.13. 676(b)(13) Provide “information describing how the State will carry out the assurances described in this section.”

Note: The State provides information for each of the assurances directly in section 14 or in corresponding items throughout the State Plan, which are included as hyperlinks in section 14.

[No response for this item]

- By checking this box, the State CSBG authorized official is certifying the assurances set out above.

SECTION 15

Federal Certifications

The box after each certification must be checked by the State CSBG authorized official.

15.1 Lobbying

Certification for Contracts, Grants, Loans, and Cooperative Agreements

The undersigned certifies, to the best of his or her knowledge and belief, that:

- (1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.
- (2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions.
- (3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Statement for Loan Guarantees and Loan Insurance

The undersigned states, to the best of his or her knowledge and belief, that:

If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title

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31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

- By checking this box, the State CSBG authorized official is providing the certification set out above.

15.2 Drug-Free Workplace Requirements

This certification is required by the regulations implementing the Drug-Free Workplace Act of 1988: 45 CFR Part 76, Subpart, F. Sections 76.630(c) and (d)(2) and 76.645 (a)(1) and (b) provide that a Federal agency may designate a central receipt point for STATE-WIDE AND STATE AGENCY-WIDE certifications, and for notification of criminal drug convictions. For the Department of Health and Human Services, the central point is: Division of Grants Management and Oversight, Office of Management and Acquisition, Department of Health and Human Services, Room 517-D, 200 Independence Avenue, SW Washington, DC 20201.

Certification Regarding Drug-Free Workplace Requirements (Instructions for Certification)

- (1) By signing and/or submitting this application or grant agreement, the grantee is providing the certification set out below.
- (2) The certification set out below is a material representation of fact upon which reliance is placed when the agency awards the grant. If it is later determined that the grantee knowingly rendered a false certification, or otherwise violates the requirements of the Drug-Free Workplace Act, the agency, in addition to any other remedies available to the Federal Government, may take action authorized under the Drug-Free Workplace Act.
- (3) For grantees other than individuals, Alternate I applies.
- (4) For grantees who are individuals, Alternate II applies.
- (5) Workplaces under grants, for grantees other than individuals, need to be identified on the certification. If known, they may be identified in the grant application. If the grantee does not identify the workplaces at the time of application, or upon award, if there is no application, the grantee must keep the identity of the workplace(s) on file in its office and make the information available for Federal inspection. Failure to identify all known workplaces constitutes a violation of the grantee's drug-free workplace requirements.
- (6) Workplace identifications must include the actual address of buildings (or parts of buildings) or other sites where work under the grant takes place. Categorical descriptions may be used (e.g., all vehicles of a mass transit authority or State highway department while in operation, State employees in each local unemployment office, performers in concert halls or radio studios).
- (7) If the workplace identified to the agency changes during the performance of the grant, the grantee shall inform the agency of the change(s), if it previously identified the workplaces in question (see paragraph five).

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- (8) Definitions of terms in the Nonprocurement Suspension and Debarment common rule and Drug-Free Workplace common rule apply to this certification. Grantees' attention is called, in particular, to the following definitions from these rules:

Controlled substance means a controlled substance in Schedules I through V of the Controlled Substances Act (21 U.S.C. 812) and as further defined by regulation (21 CFR 1308.11 through 1308.15);

Conviction means a finding of guilt (including a plea of nolo contendere) or imposition of sentence, or both, by any judicial body charged with the responsibility to determine violations of the Federal or State criminal drug statutes;

Criminal drug statute means a Federal or non-Federal criminal statute involving the manufacture, distribution, dispensing, use, or possession of any controlled substance;

Employee means the employee of a grantee directly engaged in the performance of work under a grant, including: (i) All direct charge employees; (ii) All indirect charge employees unless their impact or involvement is insignificant to the performance of the grant; and, (iii) Temporary personnel and consultants who are directly engaged in the performance of work under the grant and who are on the grantee's payroll. This definition does not include workers not on the payroll of the grantee (e.g., volunteers, even if used to meet a matching requirement; consultants or independent contractors not on the grantee's payroll; or employees of subrecipients or subcontractors in covered workplaces).

Certification Regarding Drug-Free Workplace Requirements

Alternate I. (Grantees Other Than Individuals)

The grantee certifies that it will or will continue to provide a drug-free workplace by:

- (a) Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;
- (b) Establishing an ongoing drug-free awareness program to inform employees about - -
 - (1) The dangers of drug abuse in the workplace;
 - (2) The grantee's policy of maintaining a drug-free workplace;
 - (3) Any available drug counseling, rehabilitation, and employee assistance programs; and
 - (4) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;
- (c) Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph (a);
- (d) Notifying the employee in the statement required by paragraph (a) that, as a condition of employment under the grant, the employee will - -

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- (1) Abide by the terms of the statement; and
 - (2) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;
- (e) Notifying the agency in writing, within 10 calendar days after receiving notice under paragraph (d)(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;
- (f) Taking one of the following actions, within 30 calendar days of receiving notice under paragraph (d)(2), with respect to any employee who is so convicted - -
- (1) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
 - (2) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;
- (g) Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs (a), (b), (c), (d), (e) and (f).

The grantee may insert in the space provided below the site(s) for the performance of work done in connection with the specific grant:

Place of Performance (Street address, city, county, state, zip code) **[Narrative, 2500 characters]**

Check if there are workplaces on file that are not identified here.

Alternate II. (Grantees Who Are Individuals)

- (a) The grantee certifies that, as a condition of the grant, he or she will not engage in the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance in conducting any activity with the grant;
- (b) If convicted of a criminal drug offense resulting from a violation occurring during the conduct of any grant activity, he or she will report the conviction, in writing, within 10 calendar days of the conviction, to every grant officer or other designee, unless the Federal agency designates a central point for the receipt of such notices. When notice is made to such a central point, it shall include the identification number(s) of each affected grant.

[55 FR 21690, 21702, May 25, 1990]

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- By checking this box, the State CSBG authorized official is providing the certification set out above.

15.3 Debarment

CERTIFICATION REGARDING DEBARMENT, SUSPENSION AND OTHER RESPONSIBILITY MATTERS

Certification Regarding Debarment, Suspension, and Other Responsibility Matters - -

Primary Covered Transactions

Instructions for Certification

- (1) By signing and submitting this proposal, the prospective primary participant is providing the certification set out below.
- (2) The inability of a person to provide the certification required below will not necessarily result in denial of participation in this covered transaction. The prospective participant shall submit an explanation of why it cannot provide the certification set out below. The certification or explanation will be considered in connection with the department or agency's determination whether to enter into this transaction. However, failure of the prospective primary participant to furnish a certification or an explanation shall disqualify such person from participation in this transaction.
- (3) The certification in this clause is a material representation of fact upon which reliance was placed when the department or agency determined to enter into this transaction. If it is later determined that the prospective primary participant knowingly rendered an erroneous certification, in addition to other remedies available to the Federal Government, the department or agency may terminate this transaction for cause or default.
- (4) The prospective primary participant shall provide immediate written notice to the department or agency to which this proposal is submitted if at any time the prospective primary participant learns that its certification was erroneous when submitted or has become erroneous by reason of changed circumstances.
- (5) The terms covered transaction, debarred, suspended, ineligible, lower tier covered transaction, participant, person, primary covered transaction, principal, proposal, and voluntarily excluded, as used in this clause, have the meanings set out in the Definitions and Coverage sections of the rules implementing Executive Order 12549. You may contact the department or agency to which this proposal is being submitted for assistance in obtaining a copy of those regulations.
- (6) The prospective primary participant agrees by submitting this proposal that, should the proposed covered transaction be entered into, it shall not knowingly enter into any lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, declared ineligible, or voluntarily excluded from participation in this covered transaction, unless authorized by the department or agency entering into this transaction.

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- (7) The prospective primary participant further agrees by submitting this proposal that it will include the clause titled "Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusive-Lower Tier Covered Transaction," provided by the department or agency entering into this covered transaction, without modification, in all lower tier covered transactions and in all solicitations for lower tier covered transactions.
- (8) A participant in a covered transaction may rely upon a certification of a prospective participant in a lower tier covered transaction that is not proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, ineligible, or voluntarily excluded from the covered transaction, unless it knows that the certification is erroneous. A participant may decide the method and frequency by which it determines the eligibility of its principals. Each participant may, but is not required to, check the List of Parties Excluded from Federal Procurement and Nonprocurement Programs.
- (9) Nothing contained in the foregoing shall be construed to require establishment of a system of records in order to render in good faith the certification required by this clause. The knowledge and information of a participant is not required to exceed that which is normally possessed by a prudent person in the ordinary course of business dealings.
- (10) Except for transactions authorized under paragraph 6 of these instructions, if a participant in a covered transaction knowingly enters into a lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, suspended, debarred, ineligible, or voluntarily excluded from participation in this transaction, in addition to other remedies available to the Federal Government, the department or agency may terminate this transaction for cause or default.

Certification Regarding Debarment, Suspension, and Other Responsibility Matters - -

Primary Covered Transactions

- (1) The prospective primary participant certifies to the best of its knowledge and belief, that it and its principals:
 - (a) Are not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded by any Federal department or agency;
 - (b) Have not within a three-year period preceding this proposal been convicted of or had a civil judgment rendered against them for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public (Federal, State or local) transaction or contract under a public transaction; violation of Federal or State antitrust statutes or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, or receiving stolen property;

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(c) Are not presently indicted for or otherwise criminally or civilly charged by a governmental entity (Federal, State or local) with commission of any of the offenses enumerated in paragraph (1)(b) of this certification; and

(d) Have not within a three-year period preceding this application/proposal had one or more public transactions (Federal, State or local) terminated for cause or default.

(2) Where the prospective primary participant is unable to certify to any of the statements in this certification, such prospective participant shall attach an explanation to this proposal.

Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion - - Lower Tier Covered Transactions

Instructions for Certification

- (1) By signing and submitting this proposal, the prospective lower tier participant is providing the certification set out below.
- (2) The certification in this clause is a material representation of fact upon which reliance was
- (3) placed when this transaction was entered into. If it is later determined that the prospective lower tier participant knowingly rendered an erroneous certification, in addition to other remedies available to the Federal Government the department or agency with which this transaction originated may pursue available remedies, including suspension and/or debarment.
- (4) The prospective lower tier participant shall provide immediate written notice to the person to which this proposal is submitted if at any time the prospective lower tier participant learns that its certification was erroneous when submitted or had become erroneous by reason of changed circumstances.
- (5) The terms covered transaction, debarred, suspended, ineligible, lower tier covered transaction, participant, person, primary covered transaction, principal, proposal, and voluntarily excluded, as used in this clause, have the meaning set out in the Definitions and Coverage sections of rules implementing Executive Order 12549. You may contact the person to which this proposal is submitted for assistance in obtaining a copy of those regulations.
- (6) The prospective lower tier participant agrees by submitting this proposal that, should the proposed covered transaction be entered into, it shall not knowingly enter into any lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, declared ineligible, or voluntarily excluded from participation in this covered transaction, unless authorized by the department or agency with which this transaction originated.
- (7) The prospective lower tier participant further agrees by submitting this proposal that it will include this clause titled "Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion-Lower Tier Covered Transaction," without modification, in all lower tier covered transactions and in all solicitations for lower tier covered transactions.

- (8) A participant in a covered transaction may rely upon a certification of a prospective participant in a lower tier covered transaction that it is not proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, ineligible, or voluntarily excluded from covered transactions, unless it knows that the certification is erroneous. A participant may decide the method and frequency by which it determines the eligibility of its principals. Each participant may, but is not required to, check the List of Parties Excluded from Federal Procurement and Nonprocurement Programs.
- (9) Nothing contained in the foregoing shall be construed to require establishment of a system of records in order to render in good faith the certification required by this clause. The knowledge and information of a participant is not required to exceed that which is normally possessed by a prudent person in the ordinary course of business dealings.
- (10) Except for transactions authorized under paragraph five of these instructions, if a participant in a covered transaction knowingly enters into a lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, suspended, debarred, ineligible, or voluntarily excluded from participation in this transaction, in addition to other remedies available to the Federal Government, the department or agency with which this transaction originated may pursue available remedies, including suspension and/or debarment.

Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion - - Lower Tier Covered Transactions

- (1) The prospective lower tier participant certifies, by submission of this proposal, that neither it nor its principals is presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from participation in this transaction by any Federal department or agency.
- (2) Where the prospective lower tier participant is unable to certify to any of the statements in this certification, such prospective participant shall attach an explanation to this proposal.
 By checking this box, the State CSBG authorized official is providing the certification set out above.

15.4 Environmental Tobacco Smoke

Public Law 103227, Part C Environmental Tobacco Smoke, also known as the Pro Children Act of 1994, requires that smoking not be permitted in any portion of any indoor routinely owned or leased or contracted for by an entity and used routinely or regularly for provision of health, day care, education, or library services to children under the age of 18, if the services are funded by Federal programs either directly or through State or local governments, by Federal grant, contract, loan, or loan guarantee. The law does not apply to children's services provided in private residences, facilities funded solely by Medicare or Medicaid funds, and portions of facilities used for inpatient drug or alcohol treatment. Failure to comply with the provisions of

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the law may result in the imposition of a civil monetary penalty of up to \$1000 per day and/or the imposition of an administrative compliance order on the responsible entity by signing and submitting this application the applicant/grantee certifies that it will comply with the requirements of the Act.

The applicant/grantee further agrees that it will require the language of this certification be included in any subawards which contain provisions for the children's services and that all subgrantees shall certify accordingly.

- By checking this box, the State CSBG authorized official is providing the certification set out above.

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