



Community Services Block Grant (CSBG) State Plan

CSBG Cover Page (SF-424M)

SECTION 1: CSBG Administrative Information	3
SECTION 2: State Legislation and Regulation	7
SECTION 3: State Plan Development and Statewide Goals.....	8
SECTION 4: CSBG Hearing Requirements	12
SECTION 5: CSBG Eligible Entities.....	14
SECTION 6: Organizational Standards for Eligible Entities	18
SECTION 7: State Use of Funds.....	21
SECTION 8: State Training and Technical Assistance.....	29
SECTION 9: State Linkages and Communication	34
SECTION 10: Monitoring, Corrective Action, and Fiscal Controls.....	40
SECTION 11: Eligible Entity Tripartite Board	46
SECTION 12: Individual and Community Income Eligibility Requirements	48
SECTION 13: Results Oriented Management and Accountability (ROMA) System.....	49
SECTION 14: CSBG Programmatic Assurance and Information Narrative.....	52
SECTION 15: Federal Certifications	59

THE PAPERWORK REDUCTION ACT OF 1995 (Pub. L. 104-13): Through this information collection, ACF is gathering information about planned activities related to and funded by CSBG for the upcoming fiscal year. Public reporting burden for this collection of information is estimated to average 31 hours per grantee, including the time for reviewing instructions, gathering and maintaining the data needed, and reviewing the collection of information. This is a mandatory collection of information (Sec. 676, Pub. L. 105-285, 112 Stat. 2735 (42 U.S.C. § 9908)). An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information subject to the requirements of the Paperwork Reduction Act of 1995, unless it displays a currently valid OMB control

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1.2d. Authorized Official of the Lead Agency: 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 the authorized representative on the SF-424M and the official recipient of the Notice of Award per Office of Grant Management requirements. [Narrative, 50 characters each]

Name **Chris Kluchman** Title **Undersecretary of Livable Communities**

1.2e. Street Address [Narrative, 200 characters] **100 Cambridge Street, Suite 300**

1.2f. City [Narrative, 50 characters] **Boston**

1.2g. State [Dropdown] **MA**

1.2h. Zip Code [Numerical Response, 5 digits] **02114**

1.2i. Telephone Number [Numerical Response, 10 – 15 digits to include extensions] **617-573-1100**

1.2j. Fax Number [Numerical Response, 10 digits] **617-573-1120**

1.2k. Email Address [Narrative, 150 characters] **chris.kluchman@mass.gov**

1.2l. Lead Agency Website [Narrative, 200 characters] **www.mass.gov/orgs/executive-office-of-housing-and-livable-communities**

Note: Item 1.2. pre-populates the Annual Report, Module 1, Item A.1.

1.3. Designation Letter: Attach the state’s official CSBG designation letter. A new designation letter is required if the chief executive officer of the state and/or designated agency has changed. [Attach a document.]

ATTACHMENT 1.3-Secretary Matias EOHLC Appointment Letter

[ATTACHMENT 1.3-Delegation to Undersecretary Kluchman](#)

GUIDANCE: The designation letter should be updated whenever there is a change to the designee.

INSTRUCTIONAL NOTE: The letter should be from the chief executive officer of the state and include, at minimum, the designated state CSBG lead agency (office, department, or bureau) and title of the authorized official of the lead agency who is to administer the CSBG grant award.

1.4. CSBG Point of Contact: Provide the following information in relation to the designated state CSBG point of contact. The state CSBG point of contact should be the person that will be the main point of contact for CSBG within the state.

Has information regarding the state point of contact changed since the last submission of the State Plan? **X Yes** No

If yes, select the fields that have changed. [Check all the apply]

- Agency Name Point of Contact Street Address City
- State Zip Code Office Number Fax Number
- Email Address Website

1.4a. Agency Name [Narrative, 150 characters] **Massachusetts Executive Office of Housing and Livable Communities**

1.4b. Point of Contact Name [Narrative, 50 characters each]

Name **Tamara Fahey** Title **Community Services Supervisor**

1.4c. Street Address [Narrative, 200 characters] **100 Cambridge Street, Suite 300**

1.4d. City [Narrative, 50 characters] **Boston**

1.4e. State [Dropdown] **MA**

1.4f. Zip Code [Numerical Response, 5 digits] **02114**

1.4g. Telephone Number [Numerical Response, 10 – 15 digits to include extensions] **617-573-1100**

1.4h. Fax Number [Numerical Response, 10 digits] **617-573-1120**

1.4i. Email Address [Narrative, 150 characters] **Tamara.Fahey@mass.gov**

1.4j. Agency Website [Narrative, 200 characters] **www.mass.gov/orgs/executive-office-of-housing-and-livable-communities**

1.5. Provide the following information in relation to the State Community Action Association.

There is currently a state Community Action Association within the state. Yes No

Has information regarding the state Community Action Association changed since the last submission of the State Plan? Yes No

If yes, select the fields that have changed. [Check all the apply]

- Agency Name Executive Director Street Address City
- State Zip Code Office Number Fax Number
- Email Address Website RPIC Lead

1.5a. Agency name [Narrative, 150 characters] **Massachusetts Association for Community Action (MASSCAP)**

1.5b. Executive Director or Point of Contact [Narrative, 50 characters each]

Name **Joseph Diamond** Title **Executive Director**

1.5c. Street Address [Narrative, 200 characters] **105 Chauncy Street, Suite 301**

1.5d. City [Narrative, 50 characters] **Boston**

1.5e. State [Dropdown] **MA**

1.5f. Zip Code [Numerical Response, 5 digits] **02111**

- 1.5g. Telephone Number [Numerical Response, 10 – 15 digits to include extensions]
617-357-6086
- 1.5h. Fax Number [Numerical Response, 10 digits] **N/A**
- 1.5i. Email Address [Narrative, 150 characters] **joediamond@masscap.org**
- 1.5j. State Association Website [Narrative, 200 characters] **www.masscap.org**
- 1.5k. State Association currently serves as the Regional Performance Innovation Consortia (RPIC) lead Yes **No**

SECTION 2: State Legislation and Regulation

- 2.1. CSBG State Legislation:** State has a statute authorizing CSBG. Yes No
- 2.2. CSBG State Regulation:** State has regulations for CSBG. Yes No
- 2.3. Legislation/Regulation Document:** Attach the legislation and/or regulations or provide a hyperlink(s) to the documents indicated under Items 2.1. and/or Item 2.2. [Attach a document and/or provide a link, 1500 characters]
- <https://www.mass.gov/files/documents/2017/10/25/760cmr29.pdf>
- <https://malegislature.gov/Laws/GeneralLaws/PartI/TitleII/Chapter23B/Section24>

GUIDANCE: The labeling of all attachments should include the question number for which the document provides supplementary information, the question heading, and the type of document provided. As an example, a state statutory document could be labeled as:

2.3. Legislation/Regulation Document, Washington D.C. Statute

- 2.4. State Authority:** Select a response for each of the following items about the state statute and/or regulations authorizing CSBG:
- 2.4a. Authorizing Legislation:** State legislature enacted authorizing legislation or amendments to an existing authorizing statute last federal fiscal year. Yes No
- 2.4b. Regulation Amendments:** State established or amended regulations for CSBG last federal fiscal year. 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 Executive Office of Housing and Livable Communities (EOHLC), which was formerly the Department of Housing and Community Development, was established in 2023 to create more homes and lower housing costs for Massachusetts residents. EOHLC also distributes funding to municipalities, oversees the state-aided public housing portfolio, and operates the state's Emergency Family Shelter (EA) program. EOHLC offers programs to help prevent homelessness and to help people afford housing. It also offers housing programs and financial assistance for municipalities, local housing authorities, non-profit organizations, and developers.

- 3.2. State Plan Goals:** Describe the state's CSBG-specific goals for state administration of CSBG under this State Plan. **[Narrative, 3000 characters]**

GUIDANCE: States should consider feedback from OCS, their eligible entities, and the ACSI survey completed by eligible entities when creating their State Plan goals.

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

Note: This information is associated with State Accountability Measure 1Sa(i) and populates the state's Annual Report, Module 1, Item B.1.

As the state agency assigned to oversee Massachusetts' 23 federally designated anti-poverty agencies (Community Action Agencies) and administer Community Services Block Grant (CSBG) funds, EOHLC's Division of Livable Communities is committed to partnering with the network and State Association (MASSCAP) to address and end poverty in the Commonwealth. Accordingly, our goals for State administration under this Plan are to:

1. Provide approximately \$450,000 each year in CSBG Discretionary Funds to MASSCAP as our designated TTA provider for activities that strengthen, connect, and support the network's anti-poverty work including priorities described below, which were developed jointly with MASSCAP:
 - Meeting CSBG requirements, including managing tripartite boards, and preparing for Organizational Standards/Triennial Monitoring
 - Data analysis and using data in storytelling, including funding MASSCAP to continue network use of the MySidewalk data tool.
 - Aid individual agencies facing organizational, management, and fiscal challenges with targeted technical assistance.
 - Facilitate ongoing Communities of Practice and roundtables with

Community Action staff in key focus areas (e.g. –, Planning/ROMA, Fiscal, HR, IT, CARSP, VITA, etc.)

- Raise awareness about poverty and position Community Action as a leader in economic opportunity and anti-poverty work in the Commonwealth.
 - Offer training/professional development opportunities through the MASSCAP Training Center (MTC) responsive to network needs and current realities.
2. Promote opportunities to strengthen partnerships with the Community Action network in their work with other EOHLC divisions, including Public Housing and Rental Assistance and Housing Stabilization. Work with MASSCAP to pursue linkages with other allied state agencies, such as the Executive Office of Health and Human Services and Executive Office of Education, to enhance coordination and delivery of anti-poverty services.
 3. Collaborate with the network via the Data Working Group, MASSCAP and our software vendor to incorporate significant changes to E.Gov (EOHLC’s web-based reporting system) to meet requirements of the revised federal CSBG Annual Report.
 4. Meet regularly with MASSCAP to discuss matters impacting the network and improve lines of communication including monthly with the Communities of Practice, bi-monthly with the Executive Committee, bi-annually with the Executive Directors.
 5. Attend CSBG-related training and conferences to stay informed on recent developments impacting our network. Training and conferences to include, at minimum, those coordinated by the Regional Performance and Innovation Consortium/ New England Community Action Partnership, National Community Action Partnership, CAPLAW, as well as NASCSP’s Training Conferences.

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

3.3a. Analysis of state-level tools [Check all that applies and provide additional information 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)

Monitoring Visits/Assessments

Tools Not Identified Above (specify) [Narrative, 500 characters] **State T/TA plan completed with MASSCAP**

- 3.3b. Analysis of local-level tools** [Check all that applies and provide additional information where applicable]
- Eligible Entity Community Needs Assessments**
 - Eligible Entity Community Action Plans**
 - Public Hearings/Workshops**
 - Tools Not Identified Above (e.g., state required reports) [specify]** [Narrative, 500 characters] **Workplans and progress reports submitted by MASSCAP**
- 3.3c. Consultation with** [Check all that applies and provide additional information where applicable]
- Eligible Entities (e.g., meetings, conferences, webinars; not including the public hearing)**
 - State Association**
 - National Association for State Community Services Programs (NASCSPP)
 - Community Action Partnership (NCAP)
 - Community Action Program Legal Services (CAPLAW)
 - CSBG Tribal Training and Technical Assistance (T/TA) provider
 - Regional Performance Innovation Consortium (RPIC)**
 - Association for Nationally Certified ROMA Trainers (ANCRT)
 - Federal CSBG Office
 - Organizations not identified above (specify) [Narrative, 500 characters]

3.4. Eligible Entity Involvement

- 3.4a. State Plan Development:** Describe the specific steps the state took in developing the State Plan to involve the eligible entities. [Narrative, 3000 Characters]

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

Prior to posting the draft plan, EOHLC solicited and considered informal input from the CAA network through multiple means, including through ListServ notifications to the entire network and meetings with the state association (MASSCAP) and its Executive Committee members. EOHLC also analyzes and considers a variety of CAA performance management data while developing the draft State Plan including: the CSBG Annual Report, responses to the ACSI Survey, and the network’s Community Assessment Report & Strategic Plan and Community Action Plan documents. In addition, EOHLC seeks to align the State Plan to the priority needs and strategies developed jointly with MASSCAP. Finally, the draft State Plan is posted on EOHLC’s website, along with written notification of the public comment period. Testimony received during the public comment period is considered before the plan is finalized and submitted to HHS for approval.

- 3.4b. Performance Management Adjustment:** Describe how the state has adjusted its State Plan development procedures under this State Plan, as compared to

previous State Plans, in order to 1) encourage eligible entity participation and 2) 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. [\[Narrative, 3000 Characters\]](#)

Note: This information is associated with State Accountability Measures 1Sb(i) and (ii) and pre-populate the Annual Report, Module 1, Item B.1.

Based on results of the most recent ACSI survey and other feedback, EOHLC continued efforts the network responded to favorably including 1.) Releasing a ListServ memo on January 23, 2026, outlining EOHLC's overall State Plan development process, anticipated timelines, and opportunities for network feedback. 2.) Inviting informal feedback directly to EOHLC or through MASSCAP, prior to drafting the Plan. 3.) Attending MASSCAP meetings biannually to allow all Executive Directors an additional opportunity to share feedback directly with EOHLC and taking feedback through MASSCAP's monthly Communities of Practice meetings.

3.5. Eligible Entity Overall Satisfaction: Provide the state's target for eligible entity Overall Satisfaction during the performance period. Year One [61](#) Year Two [64](#)
[\[Numerical, 3 digits\]](#)

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.

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

GUIDANCE: The targets reported here should match the future target set in the Annual Report, Section B, Table B.2.

GUIDANCE: Review the [ACSI IM](#) about setting targets for your eligible entity overall satisfaction that are realistic, reasonable, attainable, and possible.

SECTION 4: CSBG Hearing Requirements

- 4.1. Public Inspection:** Describe the steps taken by the state to disseminate this State Plan to the public for review and comments prior to the public hearing, as required under Section 676(e)(2) of the Act. **[Narrative, 2500 Characters]**

GUIDANCE: Under this question, detail how the state provided the State Plan to the public, including providing sufficient time (ideally no fewer than 30 days) for the public to provide feedback prior to the public hearing. Distribution to the public should include distribution directly to the eligible entities (e.g. via email or publication on a public website with specific notification to the eligible entities) in the state as well as any other interested parties.

The draft plan was posted for public inspection beginning June 17, 2026, on EOHL’s website and was open for public comment until July 17, 2026. Written comments received timely were considered in the development of the final plan.

- 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]**

EOHLC provided an opportunity for the public to review, and/or submit written comments on the Fiscal Years 2027 – 2028 CSBG State Plan. The draft CSBG State Plan was posted on EOHL’s website for public inspection June 17, 2026. Written notification was also provided to eligible entities and other appropriate entities announcing EOHL’s intention to hold Public Hearings on the proposed Plan. The written notification, which was posted on EOHL’s website, included the Public Hearing date and time. The Public Hearing was convened. Testimony and written comments received timely were considered in the development of the final CSBG State Plan up until.

- 4.3. Public and Legislative Hearings:** In the table below, 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.

Instructional Note: A public hearing is required for each new submission of the State Plan. 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 <i>[Select an option]</i>	If a Combined Hearing was held confirm that the public was invited.
7/9/2026	Virtual Meeting	Public	
7/19/2024	Virtual Meeting	Legislative	

NOTE: ADD-A-ROW function – States can add rows as needed for each hearing as needed

GUIDANCE: A combined hearing refers to having one joint public and legislative hearing.

4.4. Attach supporting documentation or a hyperlink for the public and legislative hearings.
[Attach supporting documentation or provide a hyperlink(s), 500 characters]

GUIDANCE: Supporting documentation may include, but is not limited to, agendas, sign-in sheets, transcripts, and notices/advertisements of the hearings. All attachments should include the question number, question heading, type of document and the date of the hearing/meeting (as applicable).

EXAMPLE NAMING CONVENTION: 4.4. Public and Legislative Hearings Agenda 062117

[\[See attachments\]](#)

[ATTACHMENT 4.4-Public Hearing](#)

[ATTACHMENT 4.4-Legislative Hearing](#)

SECTION 5: CSBG Eligible Entities

5.1. CSBG Eligible Entities: In the table below, indicate whether each eligible entity in the state is public or private, the type(s) of entity, and the geographical area served by the entity.

CSBG Eligible Entity	Geographical Area Served (by county) [Provide all counties]	Public or Nonprofit	Type of Entity [Choose all that apply]
[READ-ONLY]	[READ-ONLY]	[READ-ONLY]	[READ-ONLY] <ul style="list-style-type: none"> • Community Action Agency • Limited Purpose Agency • Migrant or Seasonal Farmworker Organization • Tribe or Tribal Organization
Action for Boston Community Development, Inc. (ABCD)	Suffolk & Middlesex	Nonprofit	Community Action Agency (CAA)
Action, Inc. (ACTION)	Essex	Nonprofit	Community Action Agency (CAA)
Berkshire Community Action Council, Inc. (BCAC)	Berkshire	Nonprofit	Community Action Agency (CAA)
Community Action Pioneer Valley, Inc. (CAPV)	Franklin & Hampshire	Nonprofit	Community Action Agency (CAA)
Community Action Agency of Somerville, Inc. (CAAS)	Middlesex	Nonprofit	Community Action Agency (CAA)
Community Action Committee of Cape Cod & Islands, Inc. (CACCI)	Barnstable & Dukes	Nonprofit	Community Action Agency (CAA)
Community Action, Inc. (CAI)	Essex	Nonprofit	Community Action Agency (CAA)
Community Action Programs Inter-City, Inc. (CAPIC)	Suffolk	Nonprofit	Community Action Agency (CAA)
Cambridge Economic Opportunity Committee, Inc. (CEOC)	Middlesex	Nonprofit	Community Action Agency (CAA)
Citizens for Citizens, Inc. (CFC)	Bristol	Nonprofit	Community Action Agency (CAA)
Community Teamwork, Inc. (CTI)	Middlesex	Nonprofit	Community Action Agency (CAA)

CSBG Eligible Entity	Geographical Area Served (by county) [Provide all counties]	Public or Nonprofit	Type of Entity [Choose all that apply]
Greater Lawrence Community Action Council, Inc. (GLCAC)	Essex	Nonprofit	Community Action Agency (CAA)
LEO, Inc. (LEO)	Essex	Nonprofit	Community Action Agency (CAA)
Making Opportunity County, Inc. (MOC)	Worcester	Nonprofit	Community Action Agency (CAA)
North Shore Community Action Programs, Inc. (NSCAP)	Essex	Nonprofit	Community Action Agency (CAA)
People Acting in Community Endeavors, Inc. (PACE)	Bristol & Barnstable	Nonprofit	Community Action Agency (CAA)
Quincy Community Action Programs, Inc. (QCAP)	Norfolk	Nonprofit	Community Action Agency (CAA)
Self-Help, Inc. (SHI)	Plymouth, Norfolk & Bristol	Nonprofit	Community Action Agency (CAA)
South Middlesex Opportunity Council, Inc. (SMOC)	Middlesex & Worcester	Nonprofit	Community Action Agency (CAA)
Springfield Partners for Community Action, Inc. (SPCA)	Hampden	Nonprofit	Community Action Agency (CAA)
South Shore Community Action Council, Inc. (SSCAC)	Plymouth	Nonprofit	Community Action Agency (CAA)
Valley Opportunity Council, Inc. (VOC)	Hampden	Nonprofit	Community Action Agency (CAA)
Worcester Community Action Council, Inc. (WCAC)	Worcester	Nonprofit	Community Action Agency (CAA)

NOTE: THE ADD-A-ROW FUNCTION WILL NOT BE AVAILABLE ON THIS TABLE. ANY ADDITIONS/DELETIONS TO THE ELIGIBLE ENTITY LIST SHOULD BE MADE WITHIN THE MASTER LIST PRIOR TO INITIALIZING A NEW CSBG STATE PLAN.

Note: Table 5.1. pre-populates the Annual Report, Module 1, Table C.1.

GUIDANCE: Under *Type of Entity*, select more than one type by holding down the CTRL key while making selections.

NOTE: Whether nonprofit or public, entities that receive CSBG funds are generally considered to be Community Action Agencies for the purpose of administering CSBG. The only specific exceptions outlined in the CSBG Act are Limited Purpose Agencies, Migrant and Seasonal Farmworker organizations, and Tribes and Tribal Organizations

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 to the eligible entities “not less than 90 percent” of their CSBG allocation “made available to a state under Section 675A or 675B.

5.2. Total number of CSBG eligible entities: **23** [This will automatically update based on Table 5.1.]

5.3. Changes to Eligible Entities List: Within the tables below, describe any changes that have occurred to the eligible entities within the state since the last federal fiscal Year (FFY), as applicable.

One or more of the following changes were made to the eligible entity list: [Check all that apply].

- Designation and/or Re-Designation
- De-Designations and/or Voluntary Relinquishments
- Mergers
- No Changes to Eligible Entities List**

GUIDANCE: The following three questions will only need to be answered based on your response to 5.3.

5.3a. Designation and Re-Designation: Identify any new entities that have been designated as eligible entities, as defined under Section 676A of the Act, since the last federal fiscal year. Include any eligible entities designated to serve an area previously not served by CSBG as well as any entities designated to replace another eligible entity that was terminated (de-designated) or that voluntarily relinquished its status as a CSBG eligible entity.

CSBG Eligible Entity	Type	Start Date	Geographical Area Served
[Narrative, 150 characters]	[Dropdown: <ul style="list-style-type: none"> • Designation • Permanent Re-Designation • Interim Re-Designation] 	[Date Picker]	[Narrative, 550 characters]
N/A	N/A	N/A	N/A

NOTE: ADD-A-ROW FUNCTION – states can add rows as needed.

GUIDANCE: A designation refers to an entity that was not receiving funding in the previous federal fiscal year(s) and/or was not included in the previous CSBG State Plan. Re-designation refers to an entity that is already designated/receiving funds but is now receiving funds to serve an additional geographic area previously served by another entity. A permanent re-designation **must be conducted -in line with procedures outlined in Section 676A of the CSBG Act.** An interim re-designation may be noted when an entity has been identified to provide services after a voluntary relinquishment pending official designation of a permanent entity consistent with the requirements of Section 676A. See CSBG Act 676A, *Designation and Redesignation...*, for more information.

5.3b. De-Designations and Voluntary Relinquishments: Identify any entities that are no longer receiving CSBG funding. Include any eligible entities have been terminated (de-designated) as defined under Section 676(c) and Section 676C of the Act, or voluntarily relinquished their CSBG eligible entity status since the last federal fiscal year.

CSBG Eligible Entity	Reason
[Narrative, 150 characters]	[Dropdown: <ul style="list-style-type: none"> • Termination/De-designation • Voluntary Relinquished]
N/A	N/A

NOTE: ADD-A-ROW FUNCTION – states can add rows as needed.

5.3c. Mergers: In the table below, provide information about any mergers or other combinations of two or more eligible entities that were individually listed in the prior State Plan.

Original CSBG Eligible Entities	Surviving CSBG Eligible Entity	New Name (as applicable)	DUNS No.
[Narrative, 500 characters] <i>List and number all entities involved.</i>	[Narrative, 150 characters]	[Narrative, 150 characters]	[Narrative, 150 characters]
N/A	N/A	N/A	N/A

NOTE: ADD-A-ROW FUNCTION – states can add rows as needed.

GUIDANCE: This question refers to the merger or other combinations of two or more existing CSBG eligible entities only.

Under 5.3c, please only include two or more **previously designated** eligible entities that have merged or combined in order to provide CSBG services.

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: Confirm whether the state will implement the CSBG Organizational Standards Center of Excellence (COE) organizational standards (as described in IM 138) or an alternative set during the federal fiscal year(s) of this planning period. [\[Select one\]](#)

COE CSBG Organizational Standards

Modified Version of COE CSBG Organizational Standards

Alternative Set of organizational standards

Note: Item 6.1. pre-populates the Annual Report, Module 1, Item D.1.

6.1a. Modified Organizational Standards: In the case that the state is requesting to use modified COE-developed organizational standards, provide the proposed modification for the FFY of this planning period including the rationale.

[\[Narrative, 2500 characters\]](#) **N/A**

6.1b. Alternative Organizational Standards: If using an alternative set of organizational standards, attach the complete list of alternative organizational standards. [\[Attachment \(as applicable\)\]](#) **N/A**

6.1c. Alternative Organizational Standards: If using an alternative set of organizational standards: 1) provide any changes from the last set provided during the previous State Plan submission; 2) describe the reasons for using alternative standards; and 3) describe how they are at least as rigorous as the COE- developed standards.

There were no changes from the previous State Plan submission [\[If not selected, provide a narrative, 2500 characters\]](#) **N/A**

Provide reason for using alternative standards [\[Narrative, 2500 characters\]](#) **N/A**

Describe rigor compared to COE-developed Standards [\[Narrative, 2500 characters\]](#) **N/A**

6.2. Implementation: Check the box that best describes how the state officially adopted organizational standards for eligible entities 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 provide a narrative \(as applicable\)\]](#)

Regulation

Policy

Contracts with Eligible Entities

Other, describe: [\[Narrative, 4000 characters\]](#)

6.3. Organizational Standards Assessment: Describe how the state will assess eligible entities against organizational standards this federal fiscal year(s). [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
- Regular On-Site CSBG monitoring**
- Other

6.3a. Assessment Process: Describe the planned assessment process. [Narrative, 4000 characters]

GUIDANCE: Descriptions should also include improvements to the process made since the previous year including any new processes to increase efficiency or consistency of assessments.

EOHLC assesses and measures performance of 58 organizational standards for eligible entities annually based on the Center of Excellence (COE) CSBG Organizational Standards State Assessment Tool for Private CSBG Eligible Entities. Eligible entities are assessed against the standards either as part of their triennial on-site review, which occurs once every three-year period in accordance with a planned calendar, or as part of an annual Organizational Standard assessment desk review. Agencies deemed at-risk, whether it's after a triennial on-site review or annual Organizational Standard assessment desk review, receive more frequent in-depth monitoring to ensure agency health is improving. EOHLC utilizes the Electronic Government (E.-Gov.) database for assessing agency performance. All eligible entities, whether they receive triennial monitoring or annual Organizational Standards monitoring, submit a self-assessment, supporting documentation and Performance Improvement Deliverables to EOHLC through E.-Gov. EOHLC analyzes the submitted documentation and validates eligible entity self-assessment responses. Validation findings are communicated to the agency and a written report is issued. For both annual desk level assessment reviews of Organizational Standards and full onsite triennial reviews, EOHLC may collaborate efforts with a 3rd Party Vendor to assess the overall health of an eligible entity. Upon completion of the assessment process, eligible entities with Performance Improvement Deliverables provide EOHLC updates on progress towards meeting those items.

6.4. Eligible Entity Exemptions: Will the state make exceptions in applying the organizational standards for certain eligible entities due to special circumstances or organizational characteristics (as described in IM 138)? Yes No

GUIDANCE: You will only need to respond to the following question if you responded “yes” to 6.4.

6.4a. Provide the specific eligible entities the state will exempt from meeting organizational standards and provide a description and a justification for each exemption. Total Number of Exempt Entities: [Auto – calculated]

CSBG Eligible Entity	Description/Justification
[Narrative, 150 characters]	[If Yes is selected, provide a narrative, 2500 characters]
N/A	N/A

NOTE: ADD-A-ROW FUNCTION – states can add rows for each additional exception.

6.5. Performance Target: Provide the percentage of eligible entities that the state expects to meet all the state-adopted organizational standards for the FFY(s) of this planning period. [Insert a percentage] **Year One 57%Year Two 61%**

Note: Item 6.5. is associated with State Accountability Measures 6Sa and pre-populates the Annual Report, Module 1, Table D.2.

GUIDANCE: Prior to setting the target, states should review [IM 138](#), review previous performance, and collaborate with the eligible entities and the state association to identify targets

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]

Historic

- Base + Formula
- Formula Alone
- Formula with Variables
- Hold Harmless + Formula
- Other

7.1a. Formula Description: Describe the current practice for allocating CSBG funds to eligible entities. [Narrative, 4000 characters]

CSBG funds are allocated through a historic distribution formula that was developed with respect to service area poverty levels and other demographic variables.

7.1b. Statute: Does a state statutory or regulatory authority specify the formula for allocating “not less than 90 percent” funds among eligible entities? **Yes** No

7.2. Planned Allocation: Specify the percentage of your CSBG planned allocation that will be funded to eligible entities and in accordance to the “not less than 90 percent funds” requirement as described under Section 675C(a) of the CSBG Act. In the table, provide the planned allocation for each eligible entity receiving funds for the fiscal year(s) covered by this plan. **Year One 90 % Year Two 90 %**

Planned CSBG 90 Percent Funds – Year One

CSBG Eligible Entity	Funding Amount (\$)
[READ-ONLY] Pre-populates from the CSBG Eligible Entity Master List	Enter the dollar amount for each eligible entity for the first FFY covered by this CSBG State Plan.
Action for Boston Community Development, Inc. (ABCD)	\$7,091,319.00
Action, Inc. (ACTION)	\$318,134.00
Berkshire Community Action Council, Inc. (BCAC)	\$436,153.00
Community Action Agency of Somerville, Inc. (CAAS)	\$407,076.00
Community Action Committee of Cape cod & Islands, Inc. (CACCI)	\$396,812.00
Community Action, Inc. (CAI)	\$330,108.00
Community Action Programs Inter-City, Inc. (CAPIC)	\$348,922.00
Cambridge Economic Opportunity Committee, Inc. (CEOC)	\$484,043.00
Citizens for Citizens, Inc. (CFC)	\$607,192.00
Community Teamwork, Inc. (CTI)	\$571,274.00
Community Action Pioneer Valley, Inc. (CAPV)	\$711,526.00
Greater Lawrence Community Action Council, Inc. (GLCAC)	\$384,840.00
LEO, Inc. (LEO)	\$496,018.00
Making Opportunity County, Inc. (MOC)	\$439,573.00
North Shore Community Action Programs, Inc. (NSCAP)	\$377,998.00

CSBG Eligible Entity	Funding Amount (\$)
People Acting in Community Endeavors, Inc. (PACE)	\$537,067.00
Quincy Community Action Programs, Inc. (QCAP)	\$314,713.00
Springfield Partners for Community Action, Inc. (SPCA)	\$581,536.00
Self-Help, Inc. (SHI)	\$511,409.00
South Middlesex Opportunity Council, Inc. (SMOC)	\$347,212.00
South Shore Community Action Council, Inc. (SSCAC)	\$314,713.00
Valley Opportunity Council, Inc. (VOC)	\$389,971.00
Worcester Community Action Council, Inc. (WCAC)	\$706,395.00
Total	\$17,104,004.00

Planned CSBG 90 Percent Funds – Year Two

CSBG Eligible Entity	Funding Amount (\$)
[READ-ONLY] Pre-populates from the CSBG Eligible Entity Master List	Enter the dollar amount for each eligible entity for the second FFY covered by this CSBG State Plan.
Action for Boston Community Development, Inc. (ABCD)	\$7,091,319.00
Action, Inc. (ACTION)	\$318,134.00
Berkshire Community Action Council, Inc. (BCAC)	\$436,153.00
Community Action Agency of Somerville, Inc. (CAAS)	\$407,076.00
Community Action Committee of Cape cod & Islands, Inc. (CACCI)	\$396,812.00
Community Action, Inc. (CAI)	\$330,108.00
Community Action Programs Inter-City, Inc. (CAPIC)	\$348,922.00
Cambridge Economic Opportunity Committee, Inc. (CEOC)	\$484,043.00
Citizens for Citizens, Inc. (CFC)	\$607,192.00
Community Teamwork, Inc. (CTI)	\$571,274.00
Community Action Pioneer Valley, Inc. (CAPV)	\$711,526.00
Greater Lawrence Community Action Council, Inc. (GLCAC)	\$384,840.00
LEO, Inc. (LEO)	\$496,018.00
Making Opportunity County, Inc. (MOC)	\$439,573.00
North Shore Community Action Programs, Inc. (NSCAP)	\$377,998.00
People Acting in Community Endeavors, Inc. (PACE)	\$537,067.00
Quincy Community Action Programs, Inc. (QCAP)	\$314,713.00
Springfield Partners for Community Action, Inc. (SPCA)	\$581,536.00
Self-Help, Inc. (SHI)	\$511,409.00
South Middlesex Opportunity Council, Inc. (SMOC)	\$347,212.00
South Shore Community Action Council, Inc. (SSCAC)	\$314,713.00
Valley Opportunity Council, Inc. (VOC)	\$389,971.00
Worcester Community Action Council, Inc. (WCAC)	\$706,395.00
Total	\$17,104,004.00

Note: This information pre-populates the state’s Annual Report, Module 1, Table E.2.

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. Please include information about state legislative approval or other types of administrative approval (such as approval by a board or commission).
[Narrative, 4000 characters]

Process Overview:

EOHLC shall award at least 90% of the CSBG funds allocated to the Commonwealth of Massachusetts to the 23 private, non-profit eligible entities based on a historical funding formula. After executing the standard contract for each eligible entity, EOHLC advances installments covering no less than a 1-month period, and not more than a 3-month period of the contracted amount to the eligible entity based on availability of funds from the HHS. EOHLC reconciles the eligible entity expenditures with the advance payments on quarterly basis.

In the event the federal CSBG appropriation for FY2027-28 is less than the amount received by the Commonwealth for FY 2026, EOHLC shall allocate funding to eligible entities based on the distribution formula used for FY 2026, or in any other manner consistent with the requirements of the CSBG Act. The annual funding and contracting cycle will correspond directly to the timely availability of funds from HHS.

Carryover Funds:

Community Services Block Grant funds distributed as grants to eligible entities that are not expended may be carried over into the next fiscal year by the entity for program expenditures. Each year, EOHLC tracks CSBG carry-over funds through three mechanisms:

1. During the CSBG Annual Application process, carry-over funds from the previous fiscal year(s) are identified in the CSBG budget.
2. Carry-over funds are then reprogrammed into the CSBG budget and reported accordingly by eligible entities.
3. Carry-over funds are also tracked by the agencies' final fiscal reports.

Any amount of carry-over (projected and/or actual) must be included in the annual eligible entity CSBG Community Action Plan and Budget as well as CSBG Quarterly Reports. Actual expenditures, including carry-over, must be posted in accounting records according to that year's approved Community Action Plan and Budget.

During routine monitoring (desk and on-site reviews), EOHLC will make recommendations to each eligible entity regarding the percentage of CSBG carry-over funds shown on the agency's books and express concern where expenditures in a given fiscal year do not reflect the Community Action Plan and Budget for the federal fiscal year in which funds were awarded. Additionally, while a reasonable amount of carry-over may be necessary in some cases (e.g. - when final approval of the Federal budget is held up), EOHLC emphasizes that timely expenditure of funds impacts funding decisions at the federal level. Finally, pursuant to EOHLC's Standard Contract with all eligible entities, if EOHLC observes an eligible entity has a high percentage of funds carried over from one fiscal year beyond the succeeding fiscal year, EOHLC may move to recapture and redistribute unobligated funds in excess of 20% of the current year's CSBG allocations, according to the procedures outlined in Section 675C (a)(3) of the Act.

7.3 a. Distribution Method: Select the option below that best describes the distribution method the state uses to issue CSBG funds to eligible entities:

- Reimbursement
- Advance**
- Hybrid
- Other [Narrative, 4000 characters]

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

7.4 a. Distribution Consistency: If no, describe state procedures to ensure funds are made available to eligible entities consistently and without interruption.
[Narrative, 4000 characters]

N/A

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

7.5. Distribution of Funds Performance Management Adjustment: Describe the state's strategy for 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, 4000 characters]

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

Based on the results of the most recent ACSI survey and other feedback, EOHLC will continue efforts the network responded to favorably in prior fiscal years to improve grant and contract administration procedures including maintaining a quarterly payment schedule and notifying the network via ListServ when contracts, amendments, and payment vouchers are available within E.Gov.

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

7.6. Allocated Funds: Specify the percentage of your CSBG planned allocation for administrative activities for the FFY(s) covered by this State Plan.

Year One 5 % Year Two 5 % [Numeric response, specify %]

Note: This information pre-populates the state's Annual Report, Module 1, Table E.4.

7.7. State Staff: Provide the number of state staff positions to be funded in whole or in part with CSBG funds for the FFY(s) covered by this State Plan.

Remainder/Discretionary Fund Uses (See 675C(b)(1) of the CSBG Act)	Planned \$	Brief Description of Services and/or Activities
funds to determine if targeting greatest need (Briefly describe under Column 4)		
7.9e. Asset-building programs (Briefly describe under Column 4)		
7.9f. Innovation programs/activities by eligible entities or other neighborhood groups (Briefly describe under Column 4)		
7.9g. State Charity tax credits (Briefly describe under Column 4)		
7.9h. Other activities (Specify these other activities under Column 4)	\$500,222.40	Activities that respond to State priorities identified by the Secretary which align to the purposes of the CSBG Act (to reduce poverty, revitalize low-income communities and/or empower low-income families and individuals to become self-sufficient.)
Totals	\$950,222.40 [auto-calculated]	

Use of Remainder/Discretionary Funds – Year Two

Remainder/Discretionary Fund Uses (See 675C(b)(1) of the CSBG Act)	Planned \$	Brief Description of Services and/or Activities
7.9a. Training/Technical Assistance to eligible entities	\$450,000	These planned services/activities will be described in State Plan Item 8.1 [Read-Only]
7.9b. Coordination of state-operated programs and/or local programs		These planned services/activities will be described in State Plan Section 9, State Linkages and Communication [Read-Only]
7.9c. Statewide coordination and communication among eligible entities		These planned services/activities will be described in State Plan Section 9, State Linkages and Communication [Read-Only]
7.9d. Analysis of distribution of CSBG funds to determine if targeting greatest need (Briefly describe under Column 4)		
7.9e. Asset-building programs (Briefly describe under Column 4)		
7.9f. Innovation programs/activities by eligible entities or other neighborhood groups (Briefly describe under Column 4)		
7.9g. State Charity tax credits (Briefly describe under Column 4)		

Remainder/Discretionary Fund Uses (See 675C(b)(1) of the CSBG Act)	Planned \$	Brief Description of Services and/or Activities
7.9h. Other activities (Specify these other activities under Column 4)	\$500,222.40	Activities that respond to State priorities identified by the Secretary which align to the purposes of the CSBG Act (to reduce poverty, revitalize low-income communities and/or empower low-income families and individuals to become self-sufficient.)
Totals	\$950,222.40 [auto-calculated]	

GUIDANCE: If the percentages provided under 7.2. and 7.6. do not equal 100%, the remaining percentage should be reported under 7.9. If the state does not have any remainder/discretionary fund activities (as listed in 7.9a. – 7.9g.), the remainder should be described in 7.9h.

7.10. Remainder/Discretionary Funds Partnerships: Select the types of organizations, if any, the state intends to work with (by grant or contract using remainder/discretionary funds) to carry out some or all the activities in Table 7.9. [Check all that applies and narrative where applicable]

- The State Directly Carries Out All Activities (No Partnerships)
- The State Partially Carries Out Some Activities
- CSBG Eligible Entities (if checked, include the expected number of CSBG eligible entities to receive funds)** [Numeric response, 0 – 100] [2]
- Other Community-based Organizations**
- State Community Action Association**
- Regional CSBG Technical Assistance Provider(s)
- National Technical Assistance Provider(s)
- Individual Consultant(s)
- Tribes and Tribal Organizations
- Other [Narrative, 2500 characters]

Note: This response will link to the corresponding CSBG assurance in Item 14.2.

7.11. Use of Remainder/Discretionary Funds Performance Management Adjustment: Describe any adjustments the state will make to the use of remainder/discretionary funds under this State Plan as compared to past State 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, 4000 characters]

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

Based on the results of the most recent ACSI survey and other feedback showing a favorable response from the network, EOHLIC will continue its multi-year investment of

discretionary funding to MASSCAP as the State's designated T/TA provider to support the network and its anti-poverty work.

SECTION 8: State Training and Technical Assistance

8.1. Training and Technical Assistance Plan: 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. The T/TA plan should include all planned CSBG T/TA activities funded through the administrative or remainder/discretionary funds of this CSBG award (as reported in Section 7). The CSBG T/TA plan should include training and technical assistance conducted directly by the state or through partnerships (as specified in 8.3). Add a row for each activity: indicate the timeframe; whether it is training, technical assistance, or both; and the topic.

Note: This information is associated with State Accountability Measure 3Sc and pre-populates the Annual Report, Module 1, Table F.1.

Training and Technical Assistance – Year One

Planned 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 • Ongoing/Multiple Quarters • All quarters 	Dropdown Options: <ul style="list-style-type: none"> • Training • Technical Assistance • Both 	Dropdown Options: <ul style="list-style-type: none"> • Fiscal • Governance/Tripartite Boards • Organizational Standards – General • Organizational Standards – for eligible entities with unmet TAPs or QIPs • Correcting Significant Deficiencies Among Eligible Entities • Reporting • ROMA • Community Assessment • Strategic Planning • Monitoring • Communication • Technology • Other 	If other is selected in Column 3, describe in this column
<i>[Select one dropdown per row]</i>	<i>[Select one dropdown per row]</i>	<i>[Select one dropdown per row]</i>	<i>[Narrative, 500 characters]</i>
Ongoing/Multiple Quarters	Training	Fiscal	
Ongoing/Multiple Quarters	Training	Governance/Tripartite Boards	
Ongoing/Multiple Quarters	Both	Organizational Standards – General	
Ongoing/Multiple Quarters	Both	Organizational Standards - for eligible entities with unmet TAPs or QIPs	
Ongoing/Multiple Quarters	Both	Correcting Significant Deficiencies Among Eligible Entities	
Ongoing/Multiple Quarters	Both	Reporting	
Ongoing/Multiple Quarters	Both	ROMA	

Planned Timeframe	Training, Technical Assistance, or Both	Topic	Brief Description of "Other"
Ongoing/Multiple Quarters	Both	Monitoring	
Ongoing/Multiple Quarters	Both	Technology	

NOTE: ADD-A-ROW FUNCTION – States can add rows for each additional training

monitoring assessments, the contracted vendor for our E.Gov reporting system, and other stakeholders in the planning and delivery of training and technical assistance (T/TA). Input on needs will be gathered through a variety of means including regular program monitoring by EOHLC, comments collected during the State Plan development process, results of the most recent ACSI survey, analysis of evaluations completed by MASSCAP Training Center (MTC) training participants, and needs assessments conducted by MASSCAP as part of their Strategic Planning process. Top needs identified thus far include data analysis/integration, communication/storytelling, customer service best practices, leadership development, and succession planning. Collaboration to plan for and deliver T/TA to meet these priority needs will occur through discussions with MTC staff, meetings with the MASSCAP Executive Committee and Board of Directors, and by meetings with the MASSCAP Communities of Practice.

Organizational Standards Technical Assistance: Does the state have Technical Assistance Plans (TAPs) in place for all eligible entities with unmet organizational standards, if appropriate? Yes No

Note: 8.2 is associated with State Accountability Measure 6Sb. The state should put a TAP in place to support eligible entities with one or more unmet organizational standards.

8.2 a. Address Unmet Organizational Standards: Describe the state’s plan to provide T/TA to eligible entities to ensure they address unmet Organizational Standards. [Narrative, 2500 characters]

For eligible entities with unmet Organizational Standards, EOHLC provides ongoing follow-up on agency Performance Improvement Deliverables. EOHLC’s policies and procedures for addressing issues related to CSBG monitoring, including unmet Organizational Standards, are further summarized in a Performance Improvement and Risk Management Matrix tool developed in collaboration with the MASSCAP Executive Committee. If an eligible entity fails to resolve a Performance Improvement Deliverable within the deadline negotiated with EOHLC, it can prompt our office to escalate the level of intervention taken as outlined in the matrix tool, which may include but is not limited to a Technical Assistance Plan. T/TA is also provided through MASSCAP and the MASSCAP Training Center to assist agencies in addressing unmet standards.

8.3. Training and Technical Assistance Organizations: Indicate the types of organizations through which the state intends 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]

All T/TA is conducted by the state

- CSBG eligible entities (if checked, provide the expected number of CSBG eligible entities to receive funds) [Numeric response, 0 – 100]
- Other community-based organizations
- State Community Action Association**
- Regional CSBG technical assistance provider(s)
- National technical assistance provider(s)**
- Individual consultant(s)**
- Tribes and Tribal Organizations
- Other [Narrative, 1000 characters]

8.4. CSBG-Funded T/TA Performance Management Adjustment: Describe adjustments the state made to 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.

Based on the results of the most recent ACSI survey and other feedback showing a favorable response from the network, EOHLC will continue its multi-year investment of discretionary funding to MASSCAP as the State’s designated T/TA provider to carry out TTA priorities developed jointly with our office and identified through the federal Office of Community Services TTA needs survey.

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 intends 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 additional information as needed. [Check all that apply from the list below and provide a Narrative, 4000 characters]

Note: This response will link to the corresponding CSBG assurance, Item 14.5. In addition, this information is associated with State Accountability Measure 7Sa and pre-populates the Annual Report, Module 1, Item G.1.

State Low Income Home Energy Assistance Program (LIHEAP) office

State Weatherization office

State Temporary Assistance for Needy Families (TANF) office

Head Start State Collaboration offices

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

9.2. State Linkages and Coordination at the Local Level: Describe how the state is encouraging partnerships and collaborations at the state level with public and private sector organizations, to assure the effective delivery and coordination of CSBG services to transform low-income communities and avoid duplication of services (as required by assurances under Section 676(b)(5) – (6)). [Narrative, 4000 characters]

EOHLC's Division of Livable Communities (DLC) administers CSBG, LIHEAP, and Weatherization, leveraging partnerships between these programs, where possible, to more effectively serve low-income people and communities. The DLC also collaborates closely with MASSCAP, where applicable, to identify opportunities for linkages and collaboration at the state level to support effective delivery and coordination of CSBG services, including strengthening connections with affordable housing, rental assistance, and homelessness prevention teams within EOHLC.

Note: This response will link to the corresponding CSBG assurances, Items 14.5 and 14.6, and pre-populates the Annual Report, Module 1, Item G.2.

9.3. Eligible Entity Linkages and Coordination

9.3 a. State Assurance of Eligible Entity Linkages and Coordination: Describe how the state will assure that eligible entities will partner and collaborate with public and private sector organizations to assure the effective delivery 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)). [Narrative, 4000 characters]

Note: This response will link to the corresponding CSBG assurance, Item 14.5. and pre-populates the Annual Report, Module 1, Item G.3a.

The State's CSBG Contract requires eligible entities issue a Community Assessment Report & Strategic Plan (CARSP) once every 3 years and that information from the CARSP be used to complete their Community Action Plan. CARSPs include descriptions of how 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.

9.3 b. 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, 4000 characters]

Note: This response will link to the corresponding CSBG assurance, Item 14.3b. and pre-populates the Annual Report, Module 1, Item G.3b.

The State's CSBG Contract requires eligible entities issue a Community Assessment Report & Strategic Plan (CARSP) once every 3 years and that information from the CARSP be used to complete their Community Action Plan. CARSPs include descriptions of how eligible entities will develop linkages to fill identified gaps in the services, through the provision of information, referrals, case management, and follow-up consultations.

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.

9.4 a. WIOA Combined Plan: 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, 4000 characters]

N/A

- 9.4 b. Employment and Training Activities:** 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, 4000 characters]

Massachusetts CSBG eligible entities coordinate efforts and link resources with employment related community partners including, but not limited to, businesses, colleges, Workforce Investment Boards, youth organizations, and one-stop career centers, to meet the immediate and long-term training and employment needs of low-income families. Through direct services (i.e. youth and adult employment, Adult Basic Education, job training, job readiness, career coaching, career preparation, financial capability integration), informal agreements, service referrals and contractual relationships, employment training program participants benefit from shared resources to access crucial occupation specific and general employment and job training opportunities. The effectiveness of employment training efforts and the retention of employment are supported by a variety of “wrap around” services offered at eligible entities including but not limited to fuel assistance, childcare, Head Start, and other supports. In addition, MASSCAP is engaged with the Mass Workforce Association to develop strategies that address income inequality through strengthened partnerships, including gaining a better understanding of where the goals of the WIOA State Plan and the CSBG State Plan align.

- 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, 4000 characters]

EOHLC is the designated lead agency responsible for administering both LIHEAP and CSBG. Of the 23 eligible entities, 19 also administer LIHEAP across all 351 communities within the Commonwealth.

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

- 9.6. Faith-based Organizations, Charitable Groups, and 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, 4000 characters]

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

The State will assure eligible entities coordinate and form partnerships with other organizations, including faith-based organizations, charitable groups, and community organizations, through our annual CSBG contract which requires eligible entities submit a Community Action Plan based upon a community assessment report and strategic plan. The State will also monitor eligible entities on a regular basis to ensure compliance with this assurance.

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, 4000 characters]

Note: This response will link to the corresponding assurance, Item 14.3c.

The State’s CSBG Contract requires eligible entities issue a Community Assessment Report & Strategic Plan (CARSP) once every 3 years and that information from the CARSP be used to complete their Community Action Plan. CARSP’s include descriptions of how eligible entities will coordinate CSBG funds with other public and private resources. Generally, eligible entities coordinate CSBG funding with other public and private resources to support specific services/strategies that address priority community needs and/or to support agency capacity to implement those services/strategies.

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, 4000 characters]

Note: This information will pre-populate the Annual Report, Module 1, Item G.5.

Throughout the year EOHLC hosts meetings, holds webinars, and sends listserv communications to support coordination among the eligible entities and the state association. Additionally, EOHLC meets regularly with MASSCAP to discuss matters impacting the network and improve lines of communication including regularly with their Communities of Practice, bi-monthly with their Executive Committee, and bi-annually with their Executive Directors. Finally, EOHLC provides discretionary funds to MASSCAP as our designated T/TA provider, for activities that strengthen, connect, and support the network in its anti-poverty work.

9.9. Communication with Eligible Entities and the State Community Action Association: In the table below, detail how the state intends to communicate with eligible entities, the State Community Action Association, and other partners identified under this State Plan on the topics listed below.

For any topic that is not applicable, select *Not Applicable* under Expected Frequency.

Communication Plan

Subject Matter	Expected Frequency	Format	Brief Description of "Other"
	<p>[Dropdown Options:</p> <ul style="list-style-type: none"> • Daily • Weekly • Twice Monthly • Monthly • Quarterly • Semi-Annually • Annually • Biannual • Triennial • As needed • Upon Request • Not Applicable] 	<p>[Select All that Apply:</p> <ul style="list-style-type: none"> • Newsletters • Mailing • Meetings/Presentations • Blog • Email • Website • Social Media • Webinar • 1:1 • Phone Calls • Public Notice • Letters/Hard Copies • Other] 	<p>If "Other" is selected in Column 3, describe in this column.</p> <p>[Narrative, 250 characters]</p>
Upcoming Public and/or Legislative Hearings	Biannual	Website Public Notice	
State Plan Development	Biannual	Email Website Public Notice	
Organizational Standards Progress	Annually	Email Meetings/Presentations	
State Accountability Measures Progress	Annually	Email Meetings/Presentations	
Community Needs Assessments/Community Action Plans	Semi-Annually	Meetings/Presentations Email Website Webinar 1:1 Phone Calls Other	Communications through E.Gov reporting system
State Monitoring Plans and Policies	As needed	Email Webinar Meetings/Presentations	
Training and Technical Assistance (T/TA) Plans	As needed	Email 1:1 Phone Calls Other	Communications through E.Gov reporting system
ROMA and Performance Management	Semi-Annually	Email 1:1 Phone Calls Other	Communications through E.Gov reporting system
State Interagency Coordination	As needed	Meetings/Presentations Email	
CSBG Legislative/Programmatic Updates	Upon Request	Meetings/Presentations Email Phone Calls	
Tripartite Board Requirements	As needed	Meetings/Presentations Email Phone Calls 1:1 Other	Communications through E.Gov reporting system

NOTE: THE ADD-A-ROW FUNCTION WILL NOT BE AVAILABLE ON THIS TABLE. ANY ADDITIONS/DELETIONS TO THE ELIGIBLE ENTITY LIST SHOULD BE MADE WITHIN THE MASTER LIST PRIOR TO INITIALIZING A NEW CSBG STATE PLAN.

9.10. Feedback to Eligible Entities and State Community Action Association: Describe how the state will provide information to local entities and State Community Action Associations regarding performance on State Accountability Measures. [Narrative, 4000 characters]

Note: This information is associated with State Accountability Measure 5S(iii) and will pre-populate the Annual Report, Module 1, Item G.6.

GUIDANCE: Under this question, include how the state will provide information to local entities and state associations within 60 days of receiving feedback from OCS.

Within 60 days of notification from the Office of Community Services regarding feedback from the Massachusetts eligible entities and MASSCAP, the State will issue a report to the local eligible entities and State Association and will follow up with the eligible entities and State Association through communication about the feedback.

9.11. Communication Plan Performance Management Adjustment: Describe any adjustments the state made to 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, 4000 characters]

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

EOHLC is not making any adjustments to the communication plan under this State Plan. Based on the results of the most recent ACSI survey and other feedback, EOHLC will continue adjustments made to our communication plan in prior years received favorably by the network including meeting regularly with MASSCAP and their Executive Committee and participating periodically in the MASSCAP CFO and Planners Communities of Practice.

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.

Note: This information is associated with State Accountability Measure 4Sa(i); this response pre-populates the Annual Report, Module 1, Table H.1.

GUIDANCE: Monitoring that is specific to organizational standards should be referenced within Section 6, Item 6.3a.

Monitoring Schedule – Year One

CSBG Eligible Entity	Monitoring Type	Review Type	Target Quarter	Start Date of Last Full Onsite Review	End Date of Last Full Onsite Review	Brief Description of “Other”
<i>[READ ONLY]</i>	[Dropdown Options: Full On-Site Newly Designated Follow-up Other No Review	[Dropdown Options: Onsite Review Desk Review]	[Dropdown Options: FY1 Q1 FY1 Q2 FY1 Q3 FY1 Q4]	<i>Select a Date</i>	<i>Select a Date</i>	<i>If “Other” is selected in Column 2, describe in this column</i> [Narrative, 500 characters]
LEO	Full On-site	Onsite Review	FY1 Q1	12/7/2023	12/7/2023	
CAPIC	Full On-site	Onsite Review	FY1 Q1	12/14/2023	12/14/2023	
NSCAP	Full On-site	Onsite Review	FY1 Q2	1/23/2024	1/23/2024	
GLCAC	Full On-site	Onsite Review	FY1 Q2	2/21/2024	2/21/2024	
QCAP	Full On-site	Onsite Review	FY1 Q2	3/19/2024	3/19/2024	
SMOC	Full On-site	Onsite Review	FY1 Q2	3/27/2024	3/27/2024	
BCAC	Full On-site	Onsite Review	FY1 Q3	4/18/2024	4/18/2024	
SPCA	Full On-site	Onsite Review	FY1 Q3	5/15/2024	5/15/2024	
VOC	Full On-site	Onsite Review	FY1 Q3	5/21/2024	5/21/2024	
CACCI	Full On-site	Onsite Review	FY1 Q3	6/27/2024	6/27/2024	
SHI	Full On-site	Onsite Review	FY1 Q4	7/18/2024	7/18/2024	
PACE	Full On-site	Onsite Review	FY1 Q4	7/25/2024	7/25/2024	

Monitoring Schedule – Year Two

CSBG Eligible Entity	Monitoring Type	Review Type	Target Quarter	Start Date of Last Full Onsite Review	End Date of Last Full Onsite Review	Brief Description of “Other”
CEOC	Full On-site	Onsite Review	FY2 Q2	1/14/2025	1/14/2025	
Action	Full On-site	Onsite Review	FY2 Q2	1/28/2025	1/28/2025	
CAAS	Full On-site	Onsite Review	FY2 Q2	2/25/2025	2/25/2025	
ABCD	Full On-site	Onsite Review	FY2 Q3	4/3/2025	4/3/2025	

WCAC	Full On-site	Onsite Review	FY2 Q3	4/8/2025	4/8/2025	
SSCAC	Full On-site	Onsite Review	FY2 Q3	5/1/2025	5/1/2025	
MOC	Full On-site	Onsite Review	FY2 Q3	5/27/2025	6/30/2025	
CTI	Full On-site	Onsite Review	FY2 Q3	6/20/2025	6/20/2025	
CFC	Full On-site	Onsite Review	FY2 Q3	6/24/2025	6/24/2025	
CAPV	Full On- Site	Onsite Review	FY2 Q4	7/10/2025	7/10/2025	
CAI	Full On- Site	Onsite Review	FY2 Q4	7/24/2025	7/24/2025	

GUIDANCE: Comprehensive monitoring includes a review of program, administrative, fiscal and organizational standards.

If you are monitoring an entity as a follow up to an issue with another program, this can be listed under “Other.”

When providing the date of your last full onsite review – this could be for any type of review that took place **onsite**. No dates for desk reviews should be provided here.

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]

[See attachment]

[ATTACHMENT 10.2-CSBG Policies and Procedures Manual](#)

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.

[60]

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 closure of findings included in the state monitoring policies attached under 10.2? Yes No

10.4a. Closing Findings Procedures: If no, describe state procedures for addressing eligible entity findings/deficiencies and the documenting closure of findings. [Narrative, 2500 characters]

If deficiencies are identified during monitoring of an eligible entity, they are documented in the Agency Assessment, EOHLIC’s web-based system for tracking monitoring results. Where a deficiency is identified, the eligible entity

proposes and submits a Performance Improvement Deliverable to address it through the Agency Assessment. Once EOHLC reviews and accepts the Performance Improvement Deliverable, the system begins tracking the deliverable date. As the eligible entity works to resolve the deficiency, they submit updates on their progress and upload supporting documentation for EOHLC through the system. Once the deficiency is resolved and appropriate supporting documentation is provided, the State accepts and closes it in the system.

- 10.5. Quality Improvement Plans (QIPs):** Provide the number of eligible entities currently on QIPs, if applicable. [Numeric Response, 0 – 100]

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

[0]

- 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, 4000 characters]

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

In the event that an eligible entity submits a proposed Quality Improvement Plan (QIP) and EOHLC has approved the plan, EOHLC will notify the Office of Community Services within 30 calendar days of State approval, pursuant to section 678C (a)(4), 42 U.S.C. § 9915(a)(4).

- 10.7. Assurance on Funding Reduction or Termination:** The state assures 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)” per Section 676(b)(8) of the CSBG Act. **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. Eligible Entity Designation:** Does the state CSBG statute and/or regulations provide for the designation of new eligible entities? **X Yes** No

- 10.8 a. New Designation Citation:** If yes, provide the citation(s) of the law and/or regulation. [Narrative, 2500 Characters]

760 CMR 29.03 (Code of Massachusetts Regulations)

M.G.L. c. 24

10.8 b. New Designation Procedures: If no, describe state procedures for the designation of new eligible entities and how the procedures were made available to eligible entities and the public. [Narrative, 4000 characters]

10.9. Eligible Entity Termination: Does the state CSBG statute and/or regulations provide for termination of eligible entities? Yes No

10.9 a. Termination Citation: If yes, provide the citation(s) of the law and/or regulation. [Narrative, 2500 characters]

760 CMR 29.05 (Code of Massachusetts Regulations)

M.G.L. c. 24

10.9 b. Termination Procedures: If no, describe state procedures for termination of new eligible entities and how the procedures were made available to eligible entities and the public. [Narrative, 4000 characters]

N/A

10.10. Eligible Entity Re-Designation: Do the state CSBG statute and/or regulations provide for re-designation of an existing eligible entity? Yes No

10.10 a. Re-Designation Citation: If yes, provide the citation(s) of the law and/or regulation. [Narrative, 2500 Characters]

760 CMR 29.03 (Code of Massachusetts Regulations)

M.G.L. c. 24

10.10 b. Re-Designation Procedures: If no, describe state procedures for re-designation of existing eligible entities and how the procedures were made available to eligible entities and the public. [Narrative, 4000 characters]

N/A

GUIDANCE: Re-designation implies that an entity that is already designated/receiving funds is now performing the duties and receiving funds that were previously designated to another entity, in addition to the funding that they are already receiving. This is different from a merger as an entity is not absorbing another entity. This re-designation may be permanent (**requires a formula redistribution**) or temporary while the state has officially designated a new entity and has completed a formula redistribution. See CSBG Act 676A, *Designation and Redesignation...*, for more information.

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, 4000 characters]

Expenditures are tracked separately by each program code and appropriation in Mosaic, the Commonwealth's financial application. Payment Request Forms are prepared by the CSBG fiscal representative and approved by the Fiscal Manager. To track individual CAA expenditures, CAAs are required to submit quarterly expenditure reports in the CSG system that compares budget to actuals by line item. Quarterly expenditure reports are reviewed and approved by the CSBG fiscal representative.

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. [Narrative, 4000 characters]

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

EOHLC will comply with the federal mandate pursuant to 45 CFR 75.521 of the OMB Super Circular. EOHLC will be responsible for issuing a management decision within six months of acceptance of the audit report by the Federal Audit Clearinghouse. The eligible entity must initiate and proceed with corrective action as rapidly as possible and corrective action should begin upon receipt of the audit report.

10.13. Assurance on Federal Investigations: The state will “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. Yes No

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

10.13a. Federal Investigations Policies: Are state procedures for permitting and cooperating with federal investigations included in the state monitoring policies attached under 10.2? Yes No

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

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

Based on the results of the most recent ACSI survey and other feedback, EOHLC will continue adjustments made to our monitoring procedures in prior years received favorably by the network including: 1) Sharing the monitoring tool utilized for triennial assessments ahead of monitoring visits to further clarify compliance requirements for the network, 2) Holding a kick-off to monitoring training session at the beginning of each monitoring year, and 3) working through the MASSCAP Communities of Practice (Planners, Fiscal, HR, etc.) to address items that may come up during monitoring at a network level. Finally, EOHLC will continue to work with our staff to maintain consistency in identifying and addressing deficiencies during monitoring.

SECTION 11: Eligible Entity Tripartite Board

11.1. Tripartite Board Verification: Verify which of the following measures are taken to ensure that the state verifies CSBG eligible entities are meeting Tripartite Board requirements under Section 676B(a)(2) of the CSBG Act. [Check all that applies and narrative where applicable]

- Attend Board meetings**
- Organizational Standards Assessment**
- Monitoring**
- Review copies of Board meeting minutes**
- Track Board vacancies/composition**
- Other** [Narrative, 2500 characters]

11.2. Tripartite Board Updates: Provide how often the state requires eligible entities (which are not on TAPs or QIPs) to provide updates regarding their Tripartite Boards. This includes but is not limited to copies of meeting minutes, vacancy alerts, changes to bylaws, low-income member selection process, etc. [Select one and provide a narrative where applicable]

- Annually
- Semiannually
- Quarterly
- Monthly
- As It Occurs
- Other** [Narrative, 2500 characters]

Frequency varies by topic.

11.3. Tripartite Board Representation Assurance: Describe how the states will verify that eligible entities have policies and procedures by which individuals or organizations can petition for adequate representation on an eligible entity's Tripartite Board as required by the assurance under Section 676(b)(10) of the CSBG Act. [Narrative, 2500 Characters]

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

State regulation 760 CMR: Section 29.06 (6) requires the by-laws of an eligible entity in the State to establish written policies and procedures under which a petition for adequate representation may be made pursuant to § 676(b)(10) of the CSBG Act, 42 U.S.C. § 9908. The annual CSBG contracts that EOHLIC executes with the State's eligible entities also require the eligible entities to assure compliance with the CSBG Act and all applicable federal requirements. Additionally, during triennial monitoring, the State monitors whether the eligible entities have policies and procedures under which a petition for adequate representation can be made.

11.4. Tripartite Board Alternative Representation: 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. [\[Narrative, 2500 Characters\]](#)

N/A

SECTION 12: Individual and Community Income Eligibility Requirements

12.1. Required Income Eligibility: Provide the income eligibility threshold for services in the state. [Select one item below and numeric response where applicable.]

- 125% of the HHS poverty line
- % of the HHS poverty line (fill in the threshold): [Numeric response]
- Varies by eligible entity [Narrative, 4000 characters]

GUIDANCE: Under *Varies by eligible entity*, provide the threshold and the reason that it varies by entity.

12.1a. Describe any state policy and/or procedures for income eligibility, such as treatment of income and family/household composition. [Narrative, 4000 characters]

State regulation 760 CMR: Section 29.07 (5) requires each eligible entity to maintain written policies and procedures sufficient to determine income eligibility for services, including written policies for generally verifying income eligibility for services with limited intake procedures. The State reviews each eligible entity's policies and procedures during the triennial monitoring process.

12.2. Income Eligibility for General/Short Term Services: Describe how the state ensures eligible entities generally verify income eligibility for those services with limited intake procedures (where individual income verification is not possible or practical). An example of these services is emergency food assistance. [Narrative, 4000 characters]

State regulation 760 CMR: Section 29.07 (5) requires each eligible entity to maintain written policies and procedures sufficient to determine income eligibility for services, including written policies for generally verifying income eligibility for services with limited intake procedures. The State reviews each eligible entity's policies and procedures during the triennial monitoring process. In cases where CSBG is used to fund services where income verification is not practical or possible, we confirm the eligible entity's policy provides a reasonable basis that those receiving the services are likely to meet CSBG income eligibility requirements (e.g. - service targeted to a census tract where majority have incomes below poverty, etc.)

12.3. Community-targeted Services: Describe how the state ensures eligible entities' services target and benefit low-income communities for those services that provide a community-wide benefit (e.g., development of community assets/facilities, building partnerships with other organizations). [Narrative, 4000 characters]

The State draws upon information provided by eligible entities in their Community Assessment Report and Strategic Plan (CARSP) as well as their annual Community Action Plan (CAP) to ensure services that provide a community-wide benefit are targeted to low-income communities. The CARSP and subsequent CAP provide a logical description of an entity's reason for providing a given service in each community, supported by data from a community assessment.

SECTION 13: Results Oriented Management and Accountability (ROMA) System

- 13.1. Performance Measurement System:** Identify the performance measurement system that the state and all eligible entities use, as required by Section 678E(a) of the CSBG Act and the assurance under Section 676(b)(12) of the CSBG Act. **[Select one]**

Note: This response will also link to the corresponding assurance, Item 14.12. and will pre-populate the Annual Report, Module 1, Item I.1.

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
- An alternative system for measuring performance and results

- 13.1 a. ROMA Description:** If ROMA was chosen in Item 13.1, describe the state’s written policies, procedures, or guidance documents on ROMA. **[Narrative, 4000 characters]**

The requirement to “implement the Results Oriented Management Accountability (ROMA) approach to program management” is included in our annual CSBG contract. To support implementation of the ROMA approach, the State provides eligible entities with a detailed planning guide for completing a community assessment report and strategic plan. The planning guide gives an overview of the ROMA approach in the context of a community assessment and strategic plan and highlights Organizational Standards wedded to ROMA. Written guidance, including information on National Performance Indicators and demographic data, is also provided to support eligible entities in completing their annual Community Action Plans and CSBG Annual Report.

- 13.1 b. Alternative System Description:** If an alternative system was chosen in Item 13.1, describe the system the state will use for performance measurement. **[Narrative, 4000 characters]**

- 13.2. Outcome Measures:** 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. **[Select one and provide a narrative, 4000 characters]**

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

X CSBG National Performance Indicators (NPIs)

- NPIs and others
- Others

The State utilizes indicators embedded in the CSBG Annual Report to measure eligible entity performance.

- 13.3. Eligible Entity Support:** Describe how the state supports the eligible entities in using ROMA or an alternative performance management system. [Narrative, 4000 characters]

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 supports eligible entities in using the ROMA system through multiple means. First, the State provides written guidance and subsequent feedback on key ROMA system documents including community assessment reports, strategic plans, and Community Action Plans, and CSBG Annual Reports. The State also coordinates periodic training to supplement written guidance and participates on monthly MASSCAP Planners Community of Practice meetings. Additionally, to help ensure eligible entity staff and Boards are knowledgeable in ROMA, EOHLC allocates discretionary funds to MASSCAP to coordinate training efforts, including support for ROMA certified professionals across the network. Finally, to underscore EOHLC’s commitment to ensuring our network effectively uses ROMA, we endeavor to have a certified ROMA professional on staff at both the State CSBG office and MASSCAP.

- 13.4. Eligible Entity Use of Data:** Describe how the state intends to validate that the eligible entities are using data to improve service delivery. [Narrative, 4000 characters]

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

State regulation 760 CMR: Section 29.07 (2) requires eligible entities submit a Community Action Plan (CAP) based upon a community-needs assessment to the State with program objectives and activities they plan to accomplish during the CSBG program year. The CAP is submitted through E.Gov, EOHLC’s web-based reporting system, and identifies any services to be provided, strategies to be implemented, and National Performance Indicators to be reported on by the eligible entity. The State also requires eligible entities to submit six month and final reports on progress meeting their targeted outcomes. Final progress report information is used to feed the eligible entities’ CSBG Annual Reports. At all reporting points the State reviews eligible entities’ actual performance compared to their target and provides feedback where needed.

Community Action Plans and Needs Assessments

- 13.5. Community Action Plan:** 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, 4000 characters]

Note: This response will link to the corresponding assurance, Item 14.11.

State regulation 760 CMR: Section 29.07 (2) requires eligible entities submit a Community Action Plan (CAP) based upon a community-needs assessment to the State with program objectives and activities they plan to accomplish during the CSBG

program year. The CAP is submitted through E.Gov, EOHLC's web-based reporting system, and is reviewed and approved by the State prior to executing an eligible entity's annual CSBG funding contract.

- 13.6. Community Needs Assessment:** 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, 4000 characters]

Note: This response will link to the corresponding assurance, Item 14.11.

State regulation 760 CMR: Section 29.07 (1) requires eligible entities submit a Community Action Plan based upon a community-needs assessment. Additionally, our CSBG Contract with eligible entities requires eligible entities to issue a Community Assessment Report & Strategic Plan (CARSP) once every 3 years and that information from the CARSP be used to complete their Community Action Plan. The CARSP development process begins with a comprehensive community needs assessment conducted by each eligible entity which typically lasts about six months. EOHLC conducted check-ins with the eligible entities partway through the process to discuss challenges and ensure they are on schedule to complete their community assessment and begin developing their strategic goals in response to identified needs.

SECTION 14: CSBG Programmatic Assurance and Information Narrative
(Section 676(b) of the CSBG Act)

14.1. Use of Funds Supporting Local Activities

CSBG Services

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

- (A) to support activities that are designed to assist low-income families and individuals, including families and individuals receiving assistance under title IV of the Social Security Act, homeless families and individuals, migrant or seasonal 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, 4000 characters]

The State will assure CSBG funding is used to support activities consistent with the purposes listed above through EOHLC’s annual CSBG contracts with the State’s eligible

entities, which require the eligible entities to assure that CSBG funding will be used in compliance with the CSBG Act and to submit a Community Action Plan based upon a community assessment report and strategic plan. The State will also monitor eligible entities to ensure compliance with this assurance.

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, 4000 characters]

The State will assure CSBG funding is used to support activities consistent with the purposes listed above through EOHLC’s annual CSBG contracts with the State’s eligible entities, which require the eligible entities to assure that CSBG funding will be used in compliance with the CSBG Act and to submit a Community Action Plan based upon a community assessment report and strategic plan. The State will also monitor eligible entities on a regular basis to ensure compliance with this assurance.

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, 4000 characters]

The State will assure CSBG funding is used to support activities consistent with the purposes listed above through EOHLC’s annual CSBG contracts with the State’s eligible entities, which require the eligible entities to assure that CSBG funding will be used in compliance with the CSBG Act and to submit a Community Action Plan based upon a community assessment report and strategic plan. The State will also monitor eligible entities on a regular basis to ensure compliance with this assurance.

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 as the state describes this assurance under 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, 4000 characters]

The State’s CSBG Contract requires eligible entities issue a Community Assessment Report & Strategic Plan (CARSP) once every 3 years and that information from the CARSP be used to complete their Community Action Plan. CARSPs include each eligible entity’s description of the service delivery system targeted to low-income families.

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 as the state describes this assurance under 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 as the state describes this assurance under 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, 4000 characters]

The State’s CSBG Contract requires eligible entities to issue a Community Assessment Report & Strategic Plan (CARSP) once every 3 years and that information from the CARSP be used to complete their Community Action Plan. Eligible entities will conduct the next CARSP process and issue their final documents by the end of 2026. Plans include descriptions of how eligible entities use the funds to support innovative community and neighborhood- based initiatives related to the purpose of the CSBG, which may include fatherhood initiatives and other initiatives with the goal of encouraging parenting.

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, 4000 characters]

The State will assure CSBG funding is used to support activities consistent with the purposes listed above through EOHLC’s annual CSBG contracts with the State’s eligible entities, which require the eligible entities to assure that CSBG funding will be used in compliance with the CSBG Act and to submit a Community Action Plan based upon a community assessment report and strategic plan. The State will also monitor eligible entities to ensure compliance with this assurance.

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 Section 9, State Linkages and Communication, specifically under 9.1 – 9.4b.

[No response as the state describes this assurance under Section 9.1 – 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 Section 9, State Linkages and Communication section, items 9.2 and 9.5.

[No response as the state describes this assurance under 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 Section 10, Fiscal Controls and Monitoring under 10.13.

[No response as the state describes this assurance under 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 Section 10 Fiscal Controls and Monitoring under 10.7.

[No response as the state describes this assurance under 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 Section 9 State Linkages and Communication, under 9.6.

[No response as the state describes this assurance under 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 Section 11 Eligible Entity Tripartite Boards, under 11.3.

[No response as the state describes this assurance under 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.”

Note: The state describes this assurance in Section 13 ROMA, under 13.5 and 13.6.

[No response as the state describes this assurance under 13.5 and 13.6]

State and Eligible Entity Performance Measurement: ROMA or Alternate system

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 Section 13 ROMA under 13.1 – 13.4.

[No response as the state describes this assurance under 13.1 – 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]

X 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 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.

X 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).
- (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 - -
 - (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]

X 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.
- (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;
 - (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 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.
- (3) 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.
- (4) 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.
- (5) 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.
- (6) 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.
- (7) 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.
- (8) 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.

- (9) 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.

X 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 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.

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



Commonwealth of Massachusetts
**EXECUTIVE OFFICE OF HOUSING &
 LIVABLE COMMUNITIES**

Maura T. Healey, Governor ♦ Kimberley Driscoll, Lieutenant Governor ♦ Juana B. Matias, Secretary

DELEGATION OF AUTHORITY

I, Juana B. Matias, being duly sworn as Secretary of the Executive Office of Housing and Livable Communities effective April 1, 2026, pursuant to the power granted to me by G. L. c. 23B §1, hereby delegate to Caroline Kluchman, Undersecretary, Livable Communities Division ("Division"), within the Executive Office of Housing and Livable Communities ("EOHLC"), the authority to sign all documents other than agreements between EOHLC and the Commonwealth of Massachusetts or the United States of America, necessary to the day-to-day operation of the Division.


The exercise of the authority delegated hereunder, in any instance, is subject to the following conditions:

1. That this is not a delegation of policy making authority and all matters relating to the creation of or change to policy shall be subject to my prior review and approval.
2. In the case of the award by EOHLC of any form of financial assistance, the prior review and approval by me of the award letter.
3. That each contract for EOHLC financial assistance, in all material matters, is consistent with such approval.
4. Ms. Kluchman is not authorized to sign any document that directly concerns matters relating to herself.

This delegation is in full force and effect from the date hereof until rescinded in writing.

Executed as a sealed instrument as of the **11** day of April, 2026.

EXECUTIVE OFFICE OF HOUSING AND
 LIVABLE COMMUNITIES OF THE
 COMMONWEALTH OF MASSACHUSETTS

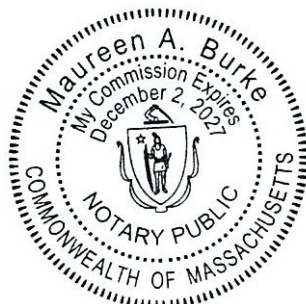
By: 
 Juana B. Matias, Secretary

COMMONWEALTH OF MASSACHUSETTS

Suffolk, ss

April **J. 1** 2026

This day before me, the undersigned Notary Public, personally appeared Juana B. Matias and proved to me, through satisfactory evidence of identification, which was personal knowledge, that she is the person whose name is signed on the above document, and acknowledged to me that she signed it voluntarily for its stated purpose and that it is her free act and deed.




 Notary Public
 My Commission Expires: **December 2, 2027**

**EXECUTIVE OFFICE OF THE
 COMMONWEALTH OF MASSACHUSETTS**

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II

EVENT DETAILS

Status:
 Upcoming
Event Date:
 Friday, July 19, 2024
Starttime:
 2:00 PM
Location:
 A-land Virtual
Event Description:
 Hearing on the biennial Community Services Block Grant (CSBG) State Application and Plan Update

The Community Services Block Grant program is a federal program that provides funds to Community Action Agencies across Massachusetts to respond to the causes and conditions of poverty.

This public hearing will include the Executive Office of Housing and Livable Communities and their plan for the program. There will not be any bills heard during this hearing.

If you have any questions, please contact Luke O'Roark at Lukeorark@mahouse.gov

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II

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UPCOMING HEARINGS
 Friday 2:00 PM
 A-land Virtual

Date	Time	Topic	Location	Status
8/16/2023		Alford Day	Completed	Q
10/24/2023	9:00 AM	Condominium Laws, Home Rule Petitions	Completed	Q
4/18/2024	9:00 AM	Late File Legislation, Home Rule Petitions	Completed	Q
7/19/2024	2:00 PM	Hearing on the Biennial Community Services Block Grant (CSBG) State Application and Plan Update	A-land Virtual	

Community Services Block Grant (CSBG) Policies and Procedures Manual



**Massachusetts Executive Office of Housing and Livable Communities
Division of Livable Communities
Community Services Unit**

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www.mass.gov/orgs/executive-office-of-housing-and-livable-communities

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Contents

I. General Information	4
a. Background and Purpose	4
b. Legislation and Guidance	4
c. Administering Agency	5
d. Eligible Entities	5
e. Funding Formula and Allocation	5
II. State Plan	7
a. Overview	7
b. Public Comment and Hearing	7
c. Development Process	8
III. Results Orientated Management and Accountability	9
a. State ROMA Support	9
b. ROMA Cycle	10
c. ROMA Reviews	10
IV. Contracts	12
a. Confidentiality	12
V. Community Action Plan	13
a. Annual Application and Contract	13
b. Reports on Progress	14
VI. State Reporting	15
a. CSBG Annual Report	15
b. Federal Financial Report (FFR) SF-425	16
c. Federal Funding Accountability and Transparency Act (FFATA) Subaward Report	17
VII. Community Assesement Report and Strategic Plan	18
a. CARSP Development Process	18
VIII. Monitoring	20
a. Purpose	20
b. Guiding Principles	20
c. Process Overview	21
d. Monitoring Schedule and Risk Assessment	21
e. Annual Organizational Standards Reviews	22
f. Triennial Reviews	22

g.	Fiscal Reviews	24
h.	Tripartite Board Monitoring.....	24
i.	Corrective Action	25
j.	Adjustments to Monitoring due to COVID-19 and CSBG CARES.....	25
IX.	Training and Technical Assistance.....	27
X.	Discretionary Funds (CSBG Special Projects).....	28
XI.	Internal Controls.....	29
XII.	Appendices.....	30
	Appendix A. Risk Assesment Evaluation	
	Appendix B. FY26 Triennial Monitoring Tool	

I. General Information

a. Background and Purpose

The Community Services Block Grant (CSBG) is federal funding from the U.S. Department of Health and Human Services (HHS) that was created through the Economic Opportunity Act of 1964 and is administered at the State and territory level. CSBG funding supports activities that help to reduce poverty, revitalize low-income communities, and empower low-income families and individuals to become self-sufficient. In Massachusetts, CSBG funding is at the core of a network of Community Action Agencies (CAAs) which mobilize resources and communities to fight poverty. Through CSBG support, CAAs can respond to the causes and conditions of poverty by delivering services and strategies tailored to meet priority needs unique to their communities.

This CSBG policies and procedures manual describes certain general principles governing the Executive Office of Housing and Livable Communities' (EOHLC's), which was formerly the department of Housing and Community Development (DHCD or Department) approach to the CSBG program. The manual outlines the tasks that EOHLC generally undertakes to meet the objectives of the CSBG program, subject to the availability of resources and upon EOHLC's evaluation of the totality of circumstances. It is not intended to be exhaustive. This manual is intended to assist EOHLC in administering the various aspects of the program, and to help fill in the gaps, clarify, interpret, and explain existing law. Certain additional program-specific protocols and provisions may be set forth in other plans, contracts, notices, administrative guidance, and/or other directives as applicable.

The manual may also include or reference forms, tools, dates, and other brief summaries of information which are provided for illustration purposes only. EOHLC may issue updates and changes to these from time to time, without requiring the reissuance of this manual. As such, EOHLC staff and the eligible entities should refer to current source documents. It is EOHLC's intent that the policies and procedures contained in this manual will be reviewed and updated as necessary, prior to submission of the CSBG State Plan.

b. Legislation and Guidance

The following legislation, guidance, and legal authority, as they may be updated from time to time, inform the CSBG policies and procedures described in this manual:

- [Coats Human Services Reauthorization Act of 1988](#) (42 USC 9901 – CSBG Act)
- [CSBG Regulation 45 CFR 96](#)
- [Community Services Block Grant Program](#) (760 CMR 29.00 - State CSBG Regulation)

- [Office of Management and Budget Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards \(2 CFR 200 – OMB “Uniform Guidance”\)](#)
- [Policy and Guidance issued periodically by HHS, Office of Community Services \(OCS\) \(Information Memorandums \(IMs\), etc.\)](#)
- Various State Laws, Regulations, EOHLC IMs and administrative guidance, and applicable contract provisions. Previous state CSBG IMs are saved in the [CSBG > Information Memorandums](#) folder on SharePoint for internal use by appropriate EOHLC staff.

c. Administering Agency

In accordance with Section 676(a)(1) of the federal Community Services Block Grant Act, as amended (Pub. 105-285) (federal CSBG Act), the Governor of the Commonwealth of Massachusetts has designated the Executive Office of Housing and Livable Communities (EOHLC) as the lead administering agency of the CSBG program.

d. Eligible Entities

Only a duly designated anti-poverty eligible entity can receive CSBG funding. Currently Massachusetts provides funding to twenty-three (23) designated nonprofit entities, also known as [CAAs](#), who provide a variety of community-based services, programs, and activities that promote self-sufficiency for low-income families and individuals residing in the Commonwealth's 351 cities and towns.

Procedures and requirements for eligible entity designation are specified in Section 29.03 of the State CSBG Regulation [760 CMR 29.00](#). Among the requirements is that each entity must be governed by a tripartite board comprised of 1/3 public officials (or their representatives), at least 1/3 representatives of low income persons selected in accordance with democratic procedures, and the remainder representatives of the private sector.

e. Funding Formula and Allocation

Federal requirements stipulate that at least 90% of CSBG funds be passed through to the CAAs. In Massachusetts these funds are distributed to CAAs based on a historical formula. Planned and actual allocations to each CAA are specified in the two-year CSBG State Plan and Annual Report, respectively.

Of the remaining 10%, states can use up to 5% for administrative costs and the remaining funds for discretionary projects that help accomplish the statutory goals of CSBG.

Procedures and requirements pertaining to funding (annual application, termination and reduction, etc.) are further specified in the State CSBG Regulation [760 CMR 29.00](#) including but not limited to sections 29.04, 29.05 and 29.07, and in contracts executed annually by the CAAs with EOHLC.

II. State Plan

a. Overview

Pursuant to Section 676 of the federal [CSBG Act](#), EOHLIC is required to submit to the Department of Health & Human Services (HHS) a state plan every two federal fiscal years. The CSBG State Plan provides program grantees information on how the State will distribute and allocate CSBG program funds, describes the State's plan to meet assurances required by the Act, and establishes state accountability measures required for the reporting period, among other things. The most recently approved State Plans are available to the public on [EOHLIC's website](#) while related documentation and prior plans are available to appropriate EOHLIC staff for internal use in the [CSBG > State Plans](#) folder on SharePoint.

The State Plan is generally prepared by the Community Services Supervisor and CSBG Program Coordinator, with sections completed by the CSBG Fiscal Representative and Fiscal Director. Prior to its submission to HHS, the Plan is typically reviewed for approval or edits as necessary by the following EOHLIC staff or their designees: Community Services Supervisor, CSBG Program Counsel, Chief Counsel, Undersecretary of Livable Communities, and the Secretary. Once approved, the Undersecretary of Livable Communities certifies the report and the CSBG Program Coordinator or Community Services Supervisor or their designee submits it to HHS through the *Online Data Collection* (OLDC) system. Once the submitted State Plan is reviewed and accepted, HHS issues an acceptance letter.

b. Public Comment and Hearing

In accordance with the federal [CSBG Act](#), EOHLIC holds a public comment period and hearing in conjunction with the development of each state plan as well as a legislative hearing every three years. Plans are due no later than 30 days prior to the beginning of the first fiscal year covered by the plan and are submitted to HHS through OLDC.

Generally, the Community Services Supervisor and CSBG Program Coordinator or their designees work with EOHLIC's legislative liaison to secure the date and location for a legislative hearing and with administrative staff to schedule the meeting room for a state plan hearing.

Prior to posting the draft plan, EOHLIC is committed to soliciting informal input from the CAA network through multiple means, including through ListServ notifications to the entire network and meetings with the state association's (MASSCAP) Executive Committee members. EOHLIC also generally analyzes and considers a variety of performance management data while developing the draft State Plan including but not limited to the CSBG Annual Report, responses to the American Customer Satisfaction Index (ACSI) Survey, and the network's Community Assessment Report & Strategic Plan and Community Action Plan documents.

The draft plan is routinely posted on EOHLC’s website, along with written notification of the public hearing date(s), time(s) and location(s). Testimony received at the hearing and timely written comments received are considered, and any appropriate changes are made before the plan is finalized and submitted to HHS for approval.

For illustration purposes, the following is a sample timeline summary of the overall State Plan development process and approximate date ranges. EOHLC reserves the right to adjust the timeline and steps as necessary.

c. Development Process

The following is a timeline summary of the overall State Plan development process:

State Plan Development Year and approximate dates	State Plan - FY 1 and approximate dates	State Plan - FY2 and approximate dates
<ul style="list-style-type: none"> • December EOHLC-CSU initiates State Plan development process • January - February Informal feedback collected and reviewed • March <i>Annual Report (prior State Plan progress) submitted to OCS</i> • April EOHLC-CSU completes State Plan draft • May State Plan draft circulated for EOHLC internal sign-off • June - July State Plan draft posted to EOHLC website, 30 Day Open Comment Period & Public Hearing held • EOHLC-CSU reviews public comments and revises Plan as needed • August State Plan circulated for EOHLC internal sign-off • September <i>State Plan submitted to OCS by 9/1</i> 	<ul style="list-style-type: none"> • October Final State Plan posted to EOHLC website (pending OCS approval) • March <i>Annual Report (prior State Plan progress) submitted to OCS</i> 	<ul style="list-style-type: none"> • December EOHLC-CSU initiates State Plan development process • January - February Informal feedback collected and reviewed • March <i>Annual Report (prior State Plan progress) submitted to OCS</i> • April EOHLC-CSU completes State Plan draft • May State Plan draft circulated for EOHLC internal sign-off • June - July State Plan draft posted to EOHLC website, 30 Day Open Comment Period & Public Hearing held • EOHLC-CSU reviews public comments and revises Plan as needed • August State Plan circulated for EOHLC internal sign-off • September <i>State Plan submitted to OCS by 9/1</i>

III. Results Orientated Management and Accountability

Section 678E(a) and the assurance under Section 676(b)(12) of the federal CSBG Act require States receiving CSBG funds to participate, and all CAAs in the State to participate, in a performance measurement system. Since 2001, Massachusetts has participated in the Results Oriented Management and Accountability (ROMA) System.

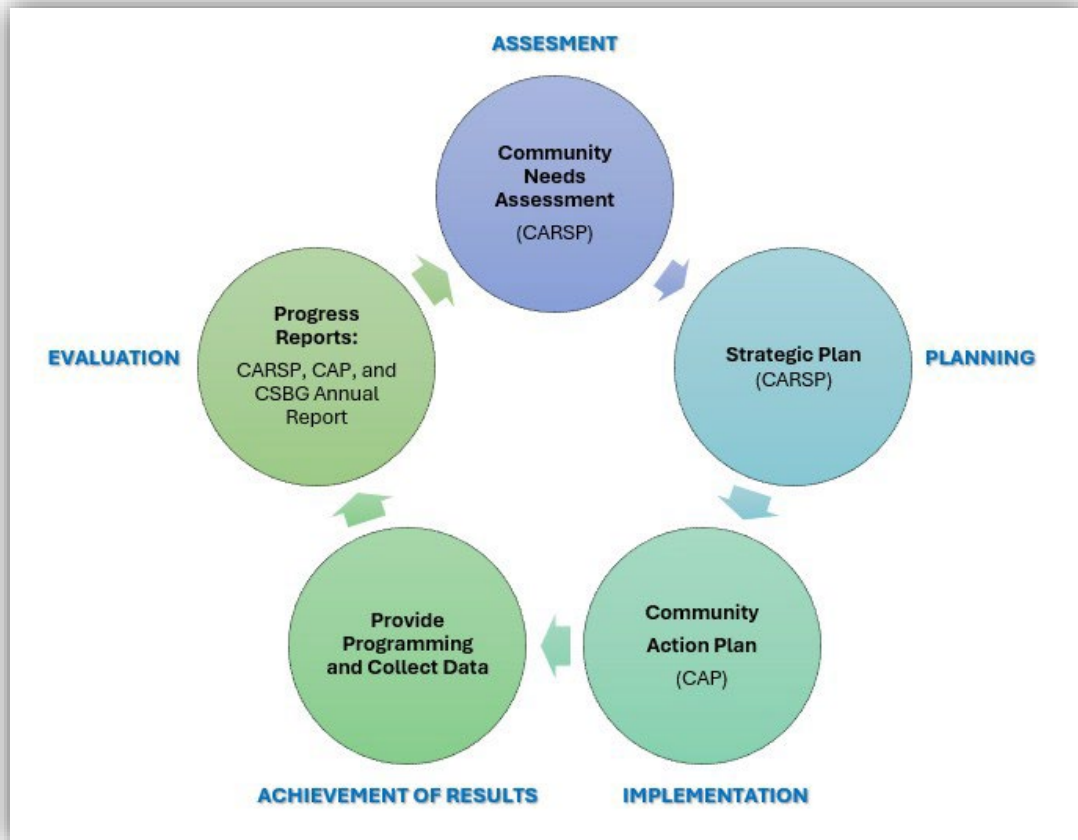
a. State ROMA Support

As part of our State participation in ROMA, EOHLC aims to support our CAA network in utilizing the ROMA System through multiple means including, but not limited, to:

- Alignment of key State CSBG deliverables with ROMA principles and practices.
- Written guidance on completing Community Action Plans and the CSBG Annual Report as well as subsequent reviews and written feedback through the State's web-based data collection system, known as *E.Gov*, on submitted reports.
- Written guidance, training, and technical assistance on conducting the three-year community assessment and strategic planning process along with subsequent reviews and written feedback on CAA planning processes and submitted reports.
- Investment of CSBG discretionary funds in the MASSCAP Training Center (MTC) to train and provide ongoing support related to ROMA implementation, including coordination of the ROMA Professional certification process.

b. ROMA Cycle

ROMA is a system for continuous quality improvement enabling the Community Action network to measure, analyze, and communicate performance. “Implementation” of ROMA generally occurs in five phases: Assessment, Planning, Implementation, Achievement of Results, and Evaluation. The following graphic depicts how key CSBG deliverables in Massachusetts align with these phases:



c. ROMA Reviews

State Accountability Measure 5S(ii) described in OCS [IM 144](#) directs States to provide eligible entities with written feedback regarding their performance in meeting ROMA goals, within 60 calendar days of submitting the State’s CSBG Annual Report.

To meet 5S(ii), EOHLC provides written feedback to our eligible entities on their performance in meeting ROMA Goals multiple times throughout the year including at the semi-annual and final CAP progress reports as well as the Annual Report. Written feedback is typically submitted

through *E.Gov* and addresses any targeting concerns and/or need for adjustment identified during the review of each report. Similarly, upon receipt of each entity's draft Community Action Plan for the subsequent year, feedback is typically provided (based on prior performance) on National Performance Indicators (NPIs) selected and targeting.

The State's ROMA review is not intended to result in feedback and guidance on specific programs and/activities. It is, however, intended to result in feedback and guidance on how well the agency implements ROMA principles. For example, a ROMA review should consider questions such as:

- Is the Need/Goal, Strategy Statement of each program, initiative, etc. included in the CAP clearly stated?
- Do the services and strategies included in the CAP address needs identified in the agency's community assessment?
- Do the selected NPIs allow the agency to monitor progress meeting their goals? (*ex. – A shelter program has the main goal of helping families obtain housing but only selects the outcome measure: "number of households experiencing homelessness who obtained safe temporary shelter." The program should also utilize the outcome: "number of households who obtained safe and affordable housing."*)
- Does the description identify measurement tools/processes to adequately track selected outcome(s)? (*ex. – An agency providing financial literacy classes using the outcome measure "number of individuals who achieved and maintained capacity to meet basic needs for 90 days" but has no means to follow-up with class attendees for 90+ days*)
- Are any of the actual NPIs reported in the Annual Report +/- 20% of what the agency targeted and if so, is there a comment that addresses the cause and/or plan to address the disparity? (**Note:** *In the context of ROMA, it is ok for an agency to fall short/exceed their target, so long as they are looking at and adjusting based the data.*)
- Are 100% of Individuals Served in Programs reported as achieving for most NPIs? (*While it is possible to have 100% achievement for certain NPIs, if an agency is reporting 100% achievement for most NPIs, they may not actually be tracking outcomes but instead just backfilling actual participants served with the number achieving the outcome.*)

IV. Contracts

The following is a summary provided for convenience. It is not intended to be an exhaustive description, and EOHLC reserves the right to adjust the steps described below as needed. Annually, each CAA must execute a contract with EOHLC for the administration of the CSBG Program. EOHLC generally requires that executed contracts be returned by the end of September. The contracts consist of several documents including the Commonwealth of Massachusetts Standard Contract Form and the Commonwealth Terms and Conditions required by the Massachusetts Office of the Comptroller, a Scope of Services for the CAA's administration of the CSBG Program, the CAA's workplan and budget for the administration of the program, and other documents that are incorporated into the contract by reference.

Each year, EOHLC's Program Legal Counsel works closely with the Community Services Supervisor or their designee, the Fiscal Unit (including the Contracts Manager), and other EOHLC staff as needed to incorporate updates to the Scope of Services. Program Legal Counsel, the Fiscal Unit, and the Community Services Supervisor review the updates to the scope of services before it may be circulated for further internal review. Program Legal Counsel and the Community Services Unit may also work together to provide information to the CAAs about the contract, such as drafting a crosswalk summarizing updates to the Scope of Services to circulate to the CAAs for their convenience/illustration purposes.

a. Confidentiality

Among specifications included in the standard contract with each CAA are requirements for maintaining records and information (including that of CSBG customers) in accordance with all State and Federal laws concerning the confidentiality of information. Below is a brief summary of the policies and laws that may be applicable. EOHLC staff and the CAAs must refer to the EOHLC contracts for the relevant contract language and authority.

- [Massachusetts Fair Information Practices Act \(M.G.L. c. 66A\)](#)
- [Security Breaches \(M.G.L. c. 93H\)](#)
- [Regarding the Security and Confidentiality of Personal Information \(the Security Policies and Standards published by the Executive Office for Technology, Services and Security \(EOTSS\), or successor EOTSS policies\)](#)
- [Privacy and Confidentiality \(801 CMR 3.00\)](#)
- [Standards for the Protection of Personal Information of Residents of the Commonwealth \(201 CMR 17.00\)](#)

V. Community Action Plan

Section 676(b)(11) of the federal [CSBG Act](#) requires States to assure they will “secure from each eligible entity in the State, as a condition to receipt of funding” a community action plan inclusive of a community-needs assessment. To meet this assurance, Massachusetts’s regulation [760 CMR 29.07 \(1\)](#) and relevant contract provisions require Massachusetts CAAs to “develop and submit a Community Action Plan to the Department [EOHLC] for review and approval” as a condition for funding. The Community Action Plan (CAP) is submitted to EOHLC through the *E.Gov* and summarizes CAA’s work over the course of a contract year. According to the State Regulation the CAP must include the following:

- 1.) A workplan with administration and program objectives, activities, and performance outcomes including relevant details on each project to be funded; and
- 2.) A CSBG budget.

The CAP process outlined below corresponds to EOHLC’s annual CSBG contract process described elsewhere in this manual. EOHLC reserves the right to adjust the process as necessary.

a. Annual Application and Contract

1. Approximately two months before the start of program year, EOHLC’s Division of Livable Communities’ Program and Fiscal Units generally coordinate to ready and open the annual Community Action Plan and Budget for agencies. Agency allocations automatically populate from the Contracts Management System therefore the Contracts Manager or their designee must enter that information first. Once the Contracts Management System is updated, the CAP can be opened within E.Gov by selecting the “Open Next Fiscal Year” function in the Report Selection screen. The Budget can be opened by clicking “Settings” in the Report Selection screen and then selecting the “Add Next Fiscal Year” function.
2. When the system is ready, EOHLC generally notifies agencies via ListServ, provides guidance and instructions on any changes from the previous year, and indicates a due date for submission.
3. Approximately one month before the start of the program year, CAAs are asked to submit their completed workplans and budgets.
4. Upon submission, the EOHLC Program Representative generally completes a ROMA review of the CAP (as outlined in the next section) and accepts the workplan in *E.Gov*. Likewise, the EOHLC Fiscal Representative completes a review of each budget and accepts in *E.Gov.*, and notifies the DCS Contracts Administrator.

Note: E.Gov related documents are available to appropriate EOHL staff for internal use in the [CSBG > E.Gov and Community Software Group](#) folder on SharePoint.

b. Reports on Progress

CAAs are required by their contracts with EOHL to submit six- and twelve-month reports on workplan progress, also referred to as the Period 2 & 3 reports. Additionally, CAAs are required to submit four quarterly fiscal reports on the operation of funded projects. All reports are generally due via *E.Gov* submission within 30 days after each reporting period ends and *E.Gov* sends auto notifications to agencies when the default date approaches. In the event EOHL adjusts a due date, the auto notification can be changed by selecting the “Administration” tile in the CSG Dashboard and modifying the date through the “eGov Reports Due Date Setup” function.

The contract between the CAA and EOHL provides protocols for the approval of any request for extensions on deadlines. Upon submission, the EOHL Program Representative generally completes a ROMA review of the progress report (as outlined in section III. of this manual) and accepts the report in *E.Gov*. Similarly, the Fiscal Unit generally completes a review and approval of quarterly fiscal reports. For the twelve-month workplan progress report, or Period 3 report, agencies are required to submit information on actual funds expended by CSBG domains and on the number of individuals served by zip code during the program year. The CSBG Program Coordinator may, in conjunction with the Program Representatives, review for certain information in the Period 3 report including total CSBG funds expended as compared to the agency’s approved quarterly fiscal report. To assist in this review, the Program Coordinator may generate the statewide “CSBG Community Action Plan Data Dump” report (*within any agency’s Period 3 report* → click “Reports” → click “CSBG Community Action Plan Data Dump”).

VI. State Reporting

a. CSBG Annual Report

Section 678E of the federal [CSBG Act](#) requires States to annually prepare and submit a report on the measured performance of the State and the eligible entities in the State. Effective for the 2018 program year, the CSBG Annual Report replaced the Information System (IS) Survey as the tool through which States submit this report. Annual Reports are due approximately 6 months after the prior program year ends and are submitted to HHS through their OLDC system. The final report submission includes 4 separate “Modules” which are prepared through slightly different processes. CAAs submit their data to EOHLC through a statewide Annual Report system in *E.Gov*.

Note: For FY20-22, a shortened version of the Annual Report was required for supplemental funds received through the Coronavirus Aid, Relief, and Economic Security (CARES) Act. These reports were prepared generally using the same processes described below.

Module 1

Module 1 includes information on the State’s actual performance during the program year and is generally prepared by the CSBG Program Coordinator, with some sections completed by the CSBG Fiscal Representative or Fiscal Director. For sections requiring CAA narratives, every agency submits examples as part of their report in *E.Gov* and the CSBG Program Coordinator and Community Services Supervisor or their designee, coupled with recommendations from Program Representatives, select the narratives to include in the statewide report. The Community Services Supervisor or their designee reviews the completed Module 1 for approval or edits, if necessary, before the CSBG Program Coordinator submits the Module in OLDC.

Module 1 Agency Narratives & Modules 2-4

The Annual Report requires states to collect information from CAAs on the demographics of clients served, uses of CSBG funds, and CAA results for the prior program year (including accomplishment narratives). Further, EOHLC’s contract requires CAAs to collect Annual Report data and information, hold it in a secure and confidential manner that complies with relevant requirements, and submit it to EOHLC approximately 4 months after the program year ends. The contract between the CAA and EOHLC provides protocols for the approval of any requests for extensions to annual reporting deadlines.

The statewide Annual Report system in *E.Gov* includes features that streamline the data cleaning process. First, it allows CAAs to import much of their data (Module 3, Module 4- Sections A & B) directly from their year end Community Action Plans (CAPs) that have already undergone ROMA reviews by EOHLC staff (as outlined in section III. of this manual). Second, the system includes error and warning checks utilized by HHS in their review of the state’s

report so CAAs can address potential data issues before submitting to EOHLC. EOHLC's review entails ensuring agencies provide adequate explanations for remaining warning flags, confirming all available data was imported from the CAP and, if imported totals are modified, the agency provided a reasonable explanation. The CSBG Program Coordinator generally completes the review of each CAA report. To help identify potential inconsistencies during the review process, the Program Coordinator may also generate a statewide report (*select "State Modules" in the Report Selection screen → click "Reports" → click "Generate Excel"*) and compare to the prior year report.

Once all agency reports are reviewed and accepted, the CSBG Program Coordinator generates the XML/XLS files (*select "State Modules" in the Report Selection screen → click "Reports" → click "Generate Export Files"*) and uploads the information into OLDC. The Community Services Supervisor or their designee reviews the statewide report in OLDC for approval or edits, if necessary, before the CSBG Program Coordinator submits all Modules in OLDC.

OCS Review Memo

Within 3-6 months of the OLDC submission, OCS will review the report and provide feedback via a "Review Memo". The CSBG Program Coordinator drafts responses for any comments EOHLC can answer directly. Comments received for Modules 2 and 4 typically require follow-up from agencies to clarify or revise data. In those cases, the Program Coordinator typically emails the comment(s) to the agency asking for a response. If agencies need to revise data, the Program Coordinator returns their reports in *E.Gov* for modification. Once the revised reports are accepted, the Program Coordinator regenerates XML/XLS file(s) for those agencies and re-uploads them into OLDC. Before the Program Coordinator submits the review memo responses and revised reports, the CSU Supervisor or their designee typically reviews for approval or edits if necessary.

b. Federal Financial Report (FFR) SF-425

Generally, the SF-425 for CSBG block grant funds is prepared by the CSBG Fiscal Representative or Fiscal Director using the "Federal Financial Report Instructions". The fiscal staff enters the report data into OLDC and saves a draft form. The draft is reviewed by the CSU Manager or their designee for approval or edits if necessary. Once approved, the CSU Manager or Undersecretary of Livable Communities or their designee certifies and submits the report in OLDC. The submitted OLDC report is printed, signed and dated by the CSU Manager, the fiscal staff who drafted the report and the Undersecretary of Livable Communities or their designees. A scanned digital copy of the report and any supporting documentation is saved in the CSBG central file.

Submission Schedule: Annual. Each annual report must be submitted within 90 days following the end of each Federal Fiscal Year.

- An Interim report (covering Year 1 of the project period) is due 90 days following the end of Federal Fiscal Year 1;
- A Final report (cumulative, covering the entire 2-year project period) is due 90 days following the end of Federal Fiscal Year 2.

c. Federal Funding Accountability and Transparency Act (FFATA) Subaward Report

In accordance with 2 CFR Chapter 1, Part 170 Reporting Sub-Award and Executive Compensation Information, Prime Awardees awarded a federal grant are required to file a FFATA sub-award report by the end of the month following the month in which the prime awardee awards any sub-grant equal to or greater than \$25,000.

Generally, the CSBG Fiscal Representative enters the sub award numbers in the Federal Sub award Reporting System (FSRS) <https://www.fsr.gov>. After all entries are complete, the CSBG Fiscal Representative will provide the FFATA report (PDF or hard copy) to the CSBG Program Manager and the Fiscal Director or their designees whom will review the entered FFATA sub award amounts and ensure they match the approved contracted amounts.

After review by the CSBG Program Manager and the Fiscal Director or their designees, the FFATA report is submitted by the Fiscal Representative and the Fiscal Representative will print the FFATA report cover sheet and will sign as Entered by, then the Fiscal Director will sign as Verified by, and the Program Manager will sign as Approved by. A scanned digital copy of the report and any supporting documentation is saved in the CSBG central file.

VII. Community Assessment Report and Strategic Plan

Among the CAA responsibilities specified in the federal [CSBG Act, 760 CMR 29.00](#), and in applicable contract provisions, is a requirement to conduct a community needs assessment. Effective 2015, further requirements were added under the Center of Excellence (COE) developed CSBG Organizational Standards, implemented in Massachusetts pursuant to OCS [IM 138](#), including that CAAs must complete a community assessment and issue a report at least every three years. The COE Standards also require CAAs to complete a strategic plan at least every five years and that certain information collected during the community assessment be included in the strategic plan. To help Massachusetts CAAs meet requirements of the federal CSBG Act, 760 CMR 29.00, and the COE Standards, EOHLC is committed to coordinating, training, and providing written guidance to CAAs in completing a community assessment and strategic plan.

To streamline workflow and better align with ROMA principles, the Massachusetts CAA network advocated combining the community needs assessment/report and strategic plan into one process conducted once every three years. The final document resulting from this three-year process, called the *Community Assessment Report & Strategic Plan* (CARSP), is submitted to EOHLC upon completion. A CAA's three-year CARSP feeds into their annual Community Action Plan (CAP) – ensuring short-term performance objectives and activities tie back to an identified need in their community served. Since the three-year CARSP and annual CAP are so entwined, EOHLC generally utilizes both documents to evaluate whether a CAA is meeting the goals of the federal CSBG Act.

a. CARSP Development Process

Approximately one year before the next CARSP is due, EOHLC aims to release a planning guide to the network and coordinate with MASSCAP to hold a network-wide training and kick-off event. The planning guide, which is available on [EOHLC's website](#), includes instructions on how to format the final document submitted to EOHLC, linkages to compliance standards, and other guidance/resources for CAAs in completing their community assessment and strategic plan. EOHLC aims to revise the planning guide every three years so that guidance and resources are timely. Previous guides and tools utilized in EOHLC's review to provide feedback are saved in the [CSBG > Community Assessment Report & Strategic Plan](#) folder on SharePoint for internal use by appropriate EOHLC staff.

After EOHLC issues the planning guide, CAAs must submit a summary of their plan for conducting the community assessment and strategic plan process including key participants, timelines, and tools to be used. Generally, EOHLC program representatives review the summary plan and provide feedback to each CAA, the purpose of which is to ensure the CAA accounted for compliance requirements and address issues with their approach to the assessment/strategic plan process.

Generally, CAAs conduct the needs assessment process for approximately 6 months and complete their CARSP writing approximately 3 months after that. EOHLC aims to conduct “check-ins” with CAAs where needed to facilitate the CARSP’s timely submission and compliance with all necessary requirements. Upon submission of the final, Board approved CARSP, EOHLC program representatives review each document and, where necessary, provide follow-up technical assistance before issuing a written approval notification to the CAA.

VIII. Monitoring

a. Purpose

Section 678B of the federal [CSBG Act](#) requires State CSBG Lead Agencies to establish “performance goals, administrative standards, financial management requirements, and other requirements” that ensure an appropriate level of accountability and quality among the State’s eligible entities. The federal CSBG Act also requires that State Lead Agencies perform a full onsite review of each CAA at least once during each three-year period, an onsite review of newly designated CAAs, and other reviews as appropriate. Further, the federal Office of Management and Budget (OMB) Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (the “Uniform Guidance”) contains requirements related to monitoring at [2 CFR Part 200.332](#), including that States must “Evaluate each subrecipient’s fraud risk and risk of noncompliance with a subaward to determine the appropriate subrecipient monitoring”. EOHLC monitors CAAs in accordance with the federal CSBG Act, the OMB Uniform Guidance, state regulations (including [760 CMR 29.00](#), the state CSBG regulation), and contractual requirements, as well as IMs published by OCS and EOHLC.

On January 26, 2015, OCS published [IM 138](#) which stated that for States to meet the responsibilities outlined in the federal CSBG Act, they “must establish and communicate clear and comprehensive standards and hold eligible entities accountable according to the standards as part of their oversight duties.” EOHLC, in collaboration with the State’s eligible entities and the State Association (MASSCAP), selected the Center of Excellence (COE) developed CSBG Organizational Standards for Private CSBG Eligible Entities as the comprehensive standards by which CAAs would be assessed annually.

b. Guiding Principles

EOHLC follows the guiding principles endorsed by the National Association of State Community Action Programs in its approach to monitoring CAA compliance with the goals of the federal CSBG Act:

Mutual Respect

In working with subgrantee boards, staff, and consultants, EOHLC values the unique knowledge, ability, and independence of each person. Mutual respect is of central concern to EOHLC.

Open Communication

EOHLC endeavors to keep lines of communication open and facilitate good working relationships with its partners. EOHLC’s goals are to communicate frequently through a variety of tools and media, assist in developing solutions to problems, share program improvement ideas, and provide information on new developments in the anti-poverty field. EOHLC is open

to contact and is committed to listening to suggestions/concerns and to gaining an understanding of local operations and assisting its local partners in pursuing CSBG priorities.

Joint Problem Solving

EOHLC endeavors to promote an environment in which the agency and all the State's eligible entities will be open to change and working together in exploring options and developing mutually agreeable solutions.

c. Process Overview

EOHLC monitors whether CAAs are meeting the goals of the federal CSBG Act through a multi-part process for each CAA which may include:

1. Reviewing three-year community assessment and strategic plan documents as well as annual Community Action Plans and Annual Report submissions (as outlined elsewhere in this manual)
2. Conducting annual desk level reviews of the Organizational Standards
3. Performing triennial reviews, at least once during each three-year period and in accordance with a planned calendar.
4. Conducting ongoing reviews of fiscal activities and contract requirements
5. Conducting Board monitoring, including ongoing reviews of minutes and periodically attending meetings

Documents utilized for CSBG monitoring, including monitoring calendars, tools, and flowcharts outlining the process, are saved in the [CSBG > Monitoring](#) folder on SharePoint for internal use by appropriate EOHLC staff. EOHLC aims to gather feedback from and communicate changes to the network ahead of each monitoring year on tools and processes to be used. Information communicated may include but is not limited to changes in guidance or approach to certain monitoring standards.

d. Monitoring Schedule and Risk Assessment

As part of the CSBG State Plan submitted to OCS, EOHLC includes an estimated schedule for triennial monitoring during the two-year State Plan period. In accordance with the OMB Uniform Guidance [2 CFR Part 200.332](#), EOHLC completes a risk assessment evaluation for each CAA approximately 4 months before the start of each program year and uses the results to inform the final monitoring schedule for the next year. The current Risk Assessment Evaluation form is included for illustration purposes in the attached *Appendix A* of this manual and copies of previous evaluations are saved in the [CSBG > Risk Assessment](#) folder on SharePoint for

internal use by appropriate EOHLC staff. Agencies are notified of scheduled monitoring through the processes specified in the Annual Organizational Standards Review and Triennial Review sections that follow. EOHLC reserves the right to adjust the processes as needed.

e. Annual Organizational Standards Reviews

In accordance with OCS IM 138, EOHLC assesses the status of CAAs in meeting all COE Organizational Standards annually. Generally, the monitoring process begins with the release of the current fiscal year *Agency Assessment*, EOHLC's web-based portal through which CAAs submit self-assessments and supporting documentation. Upon release of the *Agency Assessment*, EOHLC also notifies CAAs of the date on which their self-assessment and supporting documentation are due. Once *Agency Assessments* are submitted, EOHLC staff conducts its desk-level review and validates CAA self-assessment responses. The validation process may include follow-up with a CAA to clarify documentation provided and/or discuss a Performance Improvement Deliverable which gives the CAA the opportunity to move to a "Met" status on any standards EOHLC determines are "Not Met". Within 12 weeks of the CAA submitting their self-assessment and supporting documentation, EOHLC issues a preliminary monitoring report. For any standard deemed "Not Met" on the issued preliminary report, if documentation to satisfy the Performance Deliverable is completed, submitted, and accepted by EOHLC within 60 calendar days the standard will be moved to "Met" on the final report. Once the 60-day grace period ends, EOHLC issues the final report including any outstanding Performance Improvement Deliverables.

Additional monitoring tools utilized during annual Organizational Standards reviews are saved in the [CSBG > Monitoring](#) folder on SharePoint for internal use by appropriate EOHLC staff.

Note: CAAs scheduled for triennial monitoring are assessed similarly on the status of Organizational Standards but follow the process outlined in the next section. For both annual Organizational Standards reviews and triennial reviews, EOHLC may collaborate efforts with a 3rd Party Vendor to assess the overall health of a CAA.

f. Triennial Reviews

EOHLC's triennial monitoring provides an in-depth point-in-time assessment of a CAA's organizational capacity and compliance. To conduct triennial reviews, EOHLC utilizes comprehensive in-depth monitoring and assessment tools, which incorporate the COE's nine categories of "Organizational Standards" for private, nonprofit eligible entities as well as five categories of "Other State and Federal Compliance Standards" that address contractual and regulatory requirements. Below are the categories of standards addressed through monitoring:

COE Organizational Standards

Category 1: Consumer Input and Involvement

Category 2: Community Engagement

- Category 3: Community Assessment
- Category 4: Organizational Leadership
- Category 5: Board Governance
- Category 6: Strategic Planning
- Category 7: Human Resource Management
- Category 8: Financial Operations and Oversight
- Category 9: Data and Analysis

Other State and Federal Compliance Standards

- Category 10: Governance
- Category 11: Fiscal
- Category 12: Human Resources
- Category 13: Operational Management
- Category 14: Key Informant Surveys

EOHLC’s triennial review process includes a desk-level assessment and onsite visit. Typically, the process begins with the release of the current fiscal year *Agency Assessment*, EOHLC’s web-based portal through which CAAs submit self-assessments and supporting documentation to each monitoring standard for EOHLC’s desk review. Upon release of the *Agency Assessment*, EOHLC also notifies CAAs what month their triennial monitoring meeting will occur and estimated date their self-assessment and supporting documentation are due. Specific monitoring and *Agency Assessment* due dates are then negotiated with the CAA.

Once the CAA submits their *Agency Assessment*, the EOHLC team conducts its desk-level review and prepares follow-up questions for the CAA triennial. During the triennial, the EOHLC team meets with agency staff and Board members either virtually or in person to discuss follow-up questions and potential Performance Improvement Deliverables for any standards deemed “Not Met”. During the onsite visit, EOHLC reviews client files, human resources documentation and/or fiscal documentation as needed. After the triennial, EOHLC completes its validation of the CAA’s self-assessment considering additional information provided by the CAA. Within six weeks of the triennial, EOHLC issues a preliminary monitoring report and, where needed, holds an exit conference call with the CAA. For any standard deemed “Not Met” on the preliminary report, if documentation to satisfy the Performance Improvement Deliverable is completed and submitted within 60 calendar days, and is accepted by EOHLC, the standard will be moved to “Met” on the final report. Once the 60-day grace period ends, EOHLC issues the final report including any outstanding Performance Improvement Deliverables and/or Technical Assistance Plan items negotiated.

The current Triennial Monitoring Tool is included for illustration purposes in the attached *Appendix B* of this manual. Additional monitoring tools utilized during Triennial reviews are saved in the [CSBG > Monitoring](#) folder on SharePoint for internal use by appropriate EOHLC staff.

g. Fiscal Reviews

CAA fiscal reviews are generally conducted through multiple means. First, CAAs are required to submit quarterly fiscal reports showing budget versus actuals to EOHLC through the *Fiscal Report System* in *E.Gov*. These reports are reviewed and approved within the system by the CSBG Fiscal Representative. Second, EOHLC conducts annual reviews of the COE Organizational Standards in Category 8: Financial Operations and Oversight. Finally, in accordance with the OMB Uniform Guidance [2 CFR Part 200.332](#) to evaluate sub-recipient compliance with Federal Statutes, regulations and the terms and conditions of their sub award, reviews of the Category 11: Fiscal monitoring standards are conducted using EOHLC's Fiscal Monitoring Tool at least every three years in conjunction with the CAAs triennial assessment.

h. Tripartite Board Monitoring

EOHLC generally conducts tripartite Board monitoring through multiple means including ongoing reviews of Board meeting minutes, periodic attendance to Board meetings, and reviews of Board governing documents submitted as part of annual Organizational Standards reviews and triennial assessments. EOHLC also monitors compliance using the Board Management System in *E.Gov*, which allows CAAs to electronically manage CSBG Board requirements such as submitting meeting materials, maintaining the Board roster and composition by sector, and tracking member attendance and vacancies.

The following outlines specific processes that may be utilized for Board monitoring:

- **Selection and Composition** - EOHLC monitors CAA compliance with Board selection and composition requirements specified in Section 29.06 of the State CSBG Regulation [760 CMR 29.00](#) as well as Section 676B of the federal [CSBG Act](#) during annual Organizational Standards and triennial reviews. Monitoring each CAA includes two parts: 1) a review of the agency bylaws and 2) a review of agency compliance with their bylaws. The Board Management System includes automated reports that support CAAs and EOHLC with the second part of monitoring including reports on meeting history, member attendance, and board vacancies.
- **Board Minutes/Meeting Materials** - Section 29.06 (5)(g) of the State CSBG Regulation [760 CMR 29.00](#) requires approved Board meeting minutes and materials (agenda, financial reports, etc.) "be submitted to the Department within ten days of the date that the meeting at which the minutes were approved occurred." CAAs upload and submit minutes, attendance, and other meeting materials to EOHLC using the Board Management System. The system auto calculates whether submissions are timely based on parameters set in 760 CMR 29.00 as well as the information CAAs submit in their meeting calendar in the system and provides an updated status when they are considered overdue. EOHLC program representatives review Board meeting information

and submitted materials, documenting their review through an electronic form within the system.

- **Attendance to Board Meetings** – Program Representatives generally attend Board meetings (virtually or in person) for their assigned CAAs at minimum in conjunction with a scheduled triennial review process. In cases where EOHLC attends a Board meeting, the Board Management System allows us to document attendance and complete an electronic form specific to the visit. EOHLC may share completed Board meeting visit forms, including any feedback and recommendations, with the CAA Board chair upon completion.

i. Corrective Action

Common EOHLC policies and procedures for addressing CAA non-compliance findings and other issues related to CSBG monitoring are summarized in a performance improvement and risk management matrix tool developed in collaboration with the MASSCAP Executive Committee. The matrix tool specifies conditions in which an eligible entity's action or inaction may prompt potential state interventions, including Technical Assistance Plans and Quality Improvement Plans, and is divided into three levels: Level 1: Performance Improvement Indicators; Level 2: Compliance Correction Actions; and Level 3: State Compliance Sanctions. The tool also references the federal CSBG Act, relevant [OCS IMs](#) such as [IM 116](#), 760 CMR 29.00, and relevant contractual provisions. EOHLC notified the network of the matrix's implementation via MA CSBG IM 2018-20. Copies of the matrix and IM are saved in the [CSBG > Information Memorandums > MA CSBG IM 2018 > MA CSBG IM 2018-02 Perf. Improv't-Risk Mgmt matrix](#) folder on SharePoint for internal use by appropriate EOHLC staff.

j. Adjustments to Monitoring due to COVID-19 and CSBG CARES

A State of Emergency declaration was in place in Massachusetts from March 10, 2020 through June 15, 2021 and additional emergency protocols continued to be in place for a time due to the coronavirus pandemic. In addition, during FY20, the state received supplemental CSBG funds through the *Coronavirus Aid, Relief, and Economic Security (CARES) Act*. In response to emergency provisions put in place by the governor and legislature during the state of emergency, as well as additional monitoring requirements for CSBG CARES funding, EOHLC made a number of adjustments to our triennial monitoring approach effective for at least FY21-22 (no triennial monitoring was scheduled during FY20).

Changes to EOHLC's approach were communicated to our network through various means, including issuance of *MA CSBG IMs 2021-02* and *2022-02* and an updated Monitoring Tool (available in Appendices B and C). These documents outline flexibility granted to our network for specific monitoring standards due to the pandemic and/or their applicability to CSBG CARES. In addition, since employee travel was prohibited under state mandated pandemic protocols, EOHLC conducted triennial reviews entirely virtually during FY21. Due to rising COVID case

levels and given staffing/workplace limitations our network continues to experience, EOHLIC opted to continue virtual reviews during FY22. Reviews of documentation that normally occurred onsite were either temporarily suspended (e.g. - employee human resources files) or collected via secure electronic method (e.g. - fiscal and client file documentation).

IX. Training and Technical Assistance

As part of the CSBG State Plan submitted to OCS, EOHLC includes a description of plans for delivering CSBG-funded training and technical assistance (T/TA) to CAAs during the two-year State Plan period. A report on actual assistance provided is submitted to OCS each year as part of the CSBG Annual Report. EOHLC typically collaborates with multiple stakeholders on the planning and delivery of T/TA to the network, including the State Association (MASSCAP), the 3rd party vendor who assists with monitoring assessments, and the E.Gov software vendor. As EOHLC's designated T/TA provider, MASSCAP works closely with EOHLC ahead of each program year to ensure T/TA plans meet priority needs identified jointly.

X. Discretionary Funds (CSBG Special Projects)

As part of the CSBG State Plan submitted to OCS, EOHLC includes a description of plans for the use of discretionary funds, also known to as “CSBG Special Projects”, during the two-year State Plan period. A report on actual use of discretionary funds provided is submitted to OCS each year as part of the CSBG Annual Report. Information on spending is compiled by CSBG Program staff in conjunction with the Undersecretary of Livable Communities or their designee and Fiscal staff. Both the State Plan and Annual Report require a breakdown of activities funded in specific allowable categories (see table a.–h. below) as well as the types of organizations funded.

a. Training/technical assistance to eligible entities
b. Coordination of State-operated programs and/or local programs-
c. Statewide coordination and communication among eligible entities
d. Analysis of distribution of CSBG funds to determine if targeting greatest need
e. Asset-building programs
f. Innovative programs/activities by eligible entities or other neighborhood groups
g. State charity tax credits
h. Other activities

The contract process for discretionary funding is generally like the process outlined elsewhere in this manual, but with the following differences. The application process for the remainder/discretionary funds is also outlined on the website at [Community Services Block Grant - Special Projects \(CSBG-SP\) | Mass.gov](#).

1. Potential grantees submit written requests for funds to the EOHLC Secretary or their designee who reviews and makes a determination. Requests are accepted on a rolling basis and must include at a minimum an explanation of the need for the project, a project description, a tentative work plan, and budget.
2. When an award is made, the Undersecretary of Livable Communities or their designee notifies the CSU, including the Fiscal Director, Fiscal Director, and Fiscal Representative, or their designees. The CSU Supervisor or their designee then assigns a Program Representative to work with the grantee. The Fiscal Representative creates a Mosaic ID and provides to the Contract Manager or their designee and Program Representative before the budget/workplan is negotiated and the contract package is compiled.
3. A detailed flow chart of steps in the Special Projects process, including current Workplan and Budget/Invoice templates used, along with information on prior awards are available for internal use by appropriate EOHLC staff in the [CSBG > Special Projects](#) folder on SharePoint.

XI. Internal Controls

The policies and procedures outlined above are specific to CSBG. For further details on internal controls applicable to the entire Division of Livable Communities, please reach out to the Undersecretary, program managers, internal control officer, and legal.

XII. Appendices

Appendix A

RISK ASSESSMENT EVALUATION

Subrecipient Name: _____

Assessment Completed By: _____

Assessment Approved By: _____

Date Approved: _____

Grant Name(s) - CFDA(s) applicable to subrecipient	<input type="checkbox"/> CSBG – 93.569	<input type="checkbox"/> LIHEAP – 93.568
<i>Date of last monitoring visit (if applicable):</i>	<i>Click here to enter text.</i>	<i>Click here to enter text.</i>

RISK ASSESSMENT	CSBG	LIHEAP
1. Has the subrecipient’s key personnel (i.e., ED/CEO, Deputy/COO, CFO/Fiscal Dir., HR, Planner, etc.) changed since the last monitoring?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
2. Have more than two funding cycles (CSBG) or one funding cycle (LIHEAP) passed since the subrecipient had an on-site monitoring visit?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
3. Were there findings/violations from the last monitoring that indicate a higher level of risk*, or were there recurring unresolved findings reported from previous monitoring? <i>*Findings indicating a higher level of risk may be result of a EOHLC monitoring visit or outside audit (e.g. Office of the Inspector General, State Auditor, and Government Accounting Office). High risk findings include those that could have significant impact on subrecipient’s program compliance, including client/vendor payments, eligibility determinations, and benefits received.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
4. Is the subrecipient new to operating these program funds for EOHLC (has not done so within the past year)?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
5. Did the subrecipient fail to submit the Single Audit report to EOHLC within 9 months of the end of the subrecipient’s fiscal year?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
6. Were there any findings reported in the most recent Single Audit report (see Summary of Auditor’s Results page included in the attached Single Audit Report)?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
<i>If any “YES” responses were selected in the applicable Grant column, the subrecipient’s assessment should be “High Risk”</i>	<input type="checkbox"/> Low Risk <input type="checkbox"/> High Risk	<input type="checkbox"/> Low Risk <input type="checkbox"/> High Risk
<i>If a “YES” response was selected but subrecipient is not considered to be “High-Risk,” please explain:</i>		
<i>Based on results of this assessment and other factors, type of monitoring to be performed:</i>	<input type="checkbox"/> Desk Review <input type="checkbox"/> On-site <input type="checkbox"/> Both	<input type="checkbox"/> Desk Review <input type="checkbox"/> On-site <input type="checkbox"/> Both

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FY26 CSBG MONITORING TOOL

Rev. 9/2025

Center of Excellence (COE) Organizational Standards

Category One: Consumer Input & Involvement			
<i>Standard</i>	<i>Guidance, Acceptable Documentation, etc.</i>	<i>Follow-Up Questions:</i>	<i>Notes from onsite:</i>
1.1 The organization demonstrates low-income individuals’ participation in its activities.	<p>Guidance</p> <ul style="list-style-type: none"> For further guidance, refer to the Community Action Partnership Technical Assistance Guide <p>Documentation used: Activity participation lists Other written or online reports</p>		
1.2 The organization analyzes information collected directly from low-income individuals as part of the community assessment.	<p>Guidance</p> <ul style="list-style-type: none"> For further guidance, refer to the Community Action Partnership Technical Assistance Guide <p>Documentation used: Community assessment document (including appendices) Other written or online reports</p>	<i>For FY26 assessments, automatically met for all CAAs (based on our approval of FY24-26 Community Assessment Report)</i>	
1.3 The organization has a systematic approach for collecting, analyzing, and reporting customer satisfaction data to the governing board.	<p>Guidance</p> <ul style="list-style-type: none"> Documentation uploaded must include: 1.) the agency’s customer satisfaction data policy/procedure and 2.) minutes documenting data is reported to the governing board at the frequency defined in the agency’s policy/procedure. For further guidance, refer to the Community Action Partnership Technical Assistance Guide <p>Documentation used: Customer satisfaction instruments, e.g., survey, data collection tools and schedule Customer satisfaction policy and/or procedures Customer satisfaction reports to organization leadership, board and/or broader community.</p>		
Category Two: Community Engagement			
2.1 The organization has documented or demonstrated partnerships across the community, for specifically identified purposes; partnerships include other antipoverty organizations in the area.	<p>Guidance</p> <ul style="list-style-type: none"> Please upload the completed “EOHLC Partnerships Chart” including totals tab (fillable form was attached to the monitoring notification) For further guidance, refer to the Community Action Partnership Technical Assistance Guide <p>Documentation used: Partnership documentation: agreements, emails, MOU / MOAs, charts</p>		

2.2	The organization utilizes information gathered from key sectors of the community in assessing needs and resources, during the community assessment process or other times. These sectors would include at minimum: community-based organizations, faith-based organizations, private sector, public sector, and educational institutions.	<p>Guidance</p> <ul style="list-style-type: none"> For further guidance, refer to the Community Action Partnership Technical Assistance Guide <p>Documentation used: Community assessment document (including appendices) Other written or online reports</p>		
2.3	The organization communicates its activities and its results to the community.	<p>Guidance</p> <ul style="list-style-type: none"> Documentation uploaded must show examples of activities (e.g.-community events, news releases, etc.) AND results (e.g.-information from CAP progress reports, agency annual reports, etc.) Screen shots from the agency website and/or social media posts are acceptable. For further guidance, refer to the Community Action Partnership Technical Assistance Guide <p>Documentation used: Annual Report Media files of stories published Other written or online reports Website, Facebook page, Twitter account, etc. (regularly updated)</p>		
2.4	The organization documents the number of volunteers and hours mobilized in support of its activities.	<p>Guidance</p> <ul style="list-style-type: none"> Documentation provided must clearly summarize total hours AND total number of volunteers for at least the last full fiscal year. Note: Annual Report - Module 2, Section B documentation alone does not suffice as it does not include total number of volunteers. For further guidance, refer to the Community Action Partnership Technical Assistance Guide <p>Documentation used: Data on number of volunteers and hours provided</p>		
Category Three: Community Assessment				
3.1	The organization conducted a community assessment and issued a report within the past 3 years.	<p>Guidance</p> <ul style="list-style-type: none"> For further guidance, refer to the Community Action Partnership Technical Assistance Guide <p>Documentation used: Community assessment document (including appendices)</p>	<i>For FY26 assessments, automatically met for all CAAs (based on our approval of FY24-26 Community Assessment Report)</i>	
3.2	As part of the community assessment, the organization collects and includes current data specific to poverty and its prevalence related to gender, age, and race/ethnicity for their service area(s).	<p>Guidance</p> <ul style="list-style-type: none"> For further guidance, refer to the Community Action Partnership Technical Assistance Guide <p>Documentation used: Community assessment document (including appendices) Other written or online reports</p>	<i>For FY26 assessments, automatically met for all CAAs (based on our approval of FY24-24 Community Assessment Report)</i>	

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3.3	The organization collects and analyzes both qualitative and quantitative data on its geographic service area(s) in the community assessment.	Guidance <ul style="list-style-type: none"> For further guidance, refer to the Community Action Partnership Technical Assistance Guide Documentation used: Community assessment document (including appendices) Other written or online reports	<i>For FY26 assessments, automatically met for all CAAs (based on our approval of FY24-26 Community Assessment Report)</i>	
3.4	The community assessment includes key findings on the causes and conditions of poverty and the needs of the communities assessed.	Guidance <ul style="list-style-type: none"> For further guidance, refer to the Community Action Partnership Technical Assistance Guide Documentation used: Community assessment document (including appendices)	<i>For FY26 assessments, automatically met for all CAAs (based on our approval of FY24-26 Community Assessment Report)</i>	
3.5	The governing body formally accepts the completed community assessment.	Guidance <ul style="list-style-type: none"> For further guidance, refer to the Community Action Partnership Technical Assistance Guide Documentation used: Board minutes	<i>For FY26 assessments, automatically met for all CAAs (based on our approval of FY24-26 Community Assessment Report)</i>	
Category Four: Organizational Leadership				
4.1	The governing board has reviewed the organization’s mission statements within the past 5 years and assured that: 1. The mission addresses poverty; and 2. The organization’s programs and services are in alignment with the mission.	Guidance <ul style="list-style-type: none"> For further guidance, refer to the Community Action Partnership Technical Assistance Guide Documentation used: Board minutes Other written or online reports		
4.2	The organization’s Community Action Plan is outcome based, anti-poverty focused, and ties directly to the community assessment.	Guidance <ul style="list-style-type: none"> For further guidance, refer to the Community Action Partnership Technical Assistance Guide Documentation used: CAP plan (*sometimes referred to as the CSBG Plan or CSBG WorkPlan)		
4.3	The organization’s Community Action plan and strategic plan document the continuous use of the full Results Oriented Management and Accountability (ROMA) cycle or comparable system (assessment, planning, implementation, achievement of results, and evaluation). In addition, the organization documents having used the services of a ROMA-certified trainer (or equivalent) to assist in implementation.	Guidance <ul style="list-style-type: none"> If ROMA-certified person(s) currently on staff, upload their active certification/recertification document(s). If the agency contracts for services of a ROMA-certified person not on staff, upload their active certification/recertification document AND written agreement for services. For further guidance, refer to the Community Action Partnership Technical Assistance Guide Documentation used: Documentation of Certified ROMA trained Employee(s) or and/or Written Agreement with Certified ROMA Trainer Community action work plan update/report Strategic plan (including appendices)		

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4.4	The governing board receives an annual update on the success of specific strategies included in the Community Action Plan.	<p>Guidance</p> <ul style="list-style-type: none"> • Please provide documentation that a copy of the most recent Community Action Plan progress report (Period 2 or 3) submitted to EOHLIC was provided to the board for review • For further guidance, refer to the Community Action Partnership Technical Assistance Guide <p>Documentation used: Board minutes Community action work plan update/report</p>		
4.5	The organization has a written succession plan in place for the CEO/ED. Approved by the governing board, which contains procedures for covering an emergency/unplanned, short term absence of 3 months or less, as well as outlines the process for filling a permanently vacancy.	<p>Guidance</p> <ul style="list-style-type: none"> • For further guidance, refer to the Community Action Partnership Technical Assistance Guide <p>Documentation used: Board minutes Succession plan / policy</p>		
4.6	An organization-wide, comprehensive risk assessment has been completed within the past 2 years and reported to the governing board.	<p>Guidance</p> <ul style="list-style-type: none"> • For EOHLIC to determine whether the risk assessment completed was “comprehensive”, uploaded documentation must specify which areas were reviewed (i.e. - HR, Finance, IT, etc.) • For further guidance, refer to the Community Action Partnership Technical Assistance Guide <p>Documentation used: Board minutes Other written or online reports/risk assessment report</p>		
Category Five: Board Governance				
5.1	The Organization’s governing board is structured in compliance with the CSBG Act: 1. At least one third democratically selected representatives of the low-income community; 2. One-third local elected officials (or their representatives); and 3. The remaining membership from major groups and interests in the community.	<p>Guidance</p> <ul style="list-style-type: none"> • Note: this standard requires language in the agency bylaws aligns with language of the CSBG Act. • For further guidance, refer to the Community Action Partnership Technical Assistance Guide <p>Documentation used: Board bylaws</p>		

5.2	The organization’s governing board has written procedures that document a democratic selection process for low-income board members adequate to assure that they are representative of the low-income community.	<p>Guidance</p> <ul style="list-style-type: none"> Note: 760 CMR 29.06 (1) specifies four selection procedures Massachusetts agencies may use, either separately or in combination. If your bylaws restate multiple procedures, please also upload the written procedures that identify the current preferred method. For further guidance, refer to the Community Action Partnership Technical Assistance Guide <p>Documentation used: Board bylaws Board policies and procedures Other written or online reports</p>		
5.3	The organization’s bylaws have been reviewed by an attorney within the past 5 years.	<p>Guidance</p> <ul style="list-style-type: none"> Documentation uploaded must 1.) Specify the attorney reviewed the bylaws and 2.) Note the date(s) the review was completed. For further guidance, refer to the Community Action Partnership Technical Assistance Guide <p>Documentation used: Other written or online reports Statement/invoice from an attorney reflecting the review</p>		
5.4	The organization documents that each governing board member has received a copy of the bylaws within the past two years.	<p>Guidance</p> <ul style="list-style-type: none"> EOHLC will validate this standard through review of information uploaded in the Board Management System. For each currently seated Board member, upload the information under the “Documents” tab within their member profile. The standard requires all current board members receive the bylaws. Options for documentation include: 1.) Board minutes that reflect bylaws were distributed at the meeting AND all members were in attendance, 2.) a signed/dated confirmation receipt from each Board member, 3.) email or other electronic acknowledgement of receipt from each Board member. For each acknowledgement, be sure the member’s name is clear and legible (e.g. – printed name coincides with signature and/or email address). For further guidance, refer to the Community Action Partnership Technical Assistance Guide <p>Documentation used: Board minutes Copies of acknowledgements List of signatures</p>		

5.5	<p>The organization’s governing board meets in accordance with the frequency and quorum requirements and fills board vacancies as set out in its bylaws.</p>	<p>Guidance</p> <ul style="list-style-type: none"> In addition to documentation uploaded, EOHLC will further validate this standard through ongoing review of information submitted through the Board Management System. Please ensure all Board Management System information is current as of the date of your assessment upload including the Board Member List, Meeting Calendar, etc. Nomination letters should also be uploaded to applicable Public and Low-Income member profiles. If your bylaws specify for the Private sector that the agency selects organizations who choose persons to represent them, nomination letters must also be uploaded to Private Sector member profiles. For further guidance, refer to the Community Action Partnership Technical Assistance Guide <p>Documentation used: Board bylaws* Other written or online reports</p>	<p>Review Board Management System to confirm:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Current BOD composition complies with agency bylaws <input type="checkbox"/> Applicable Public, Low-Income and Private sector members have current nomination letters uploaded to their profiles. <input type="checkbox"/> No current vacancy has existed more 180+ days. <input type="checkbox"/> Meeting calendar/submitted meetings are up to date. <p>Review meeting submissions (since last monitoring) to confirm:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Vacancies were filled according to bylaws requirements <input type="checkbox"/> Quorum of 50% of filled board seats for meetings <input type="checkbox"/> BOD met at least 6 times each year <input type="checkbox"/> Public notice given at least 5 days in advance of meetings (<i>check “Meeting Ads” agency uploaded to Board Management System</i>) <input type="checkbox"/> Written notice and an agenda sent to board members at least 7 days in advance of meetings <input type="checkbox"/> Board members do not vote by proxy <input type="checkbox"/> All BOD meetings open to public and Executive sessions held according to OML 	
5.6	<p>Each governing board member has signed a conflict of interest policy within the past 2 years.</p>	<p>Guidance</p> <ul style="list-style-type: none"> EOHLC will validate this standard through review of information uploaded in the Board Management System. For each currently seated Board member, upload the information under the “Documents” tab within their member profile. The standard requires all current board members signed a COI policy. For each sign-off be sure it 1.) is dated, 2.) includes the policy the Board member signed-off on, and 3.) the member’s name is clear and legible (e.g. – printed name coincides with signature). Note: electronic signatures are acceptable so long as the other requirements are met. For further guidance, refer to the Community Action Partnership Technical Assistance Guide <p>Documentation used: Other written or online reports Signed policies/signature list</p>		

5.7	The organization has a process to provide a structured orientation for governing board members within 6 months of being seated.	<p>Guidance</p> <ul style="list-style-type: none"> Please upload the policy/procedure that outlines the current orientation process including timeframe (e.g. – within 6 months of being seated.) For further guidance, refer to the Community Action Partnership Technical Assistance Guide <p>Documentation used: Board policies and procedures Other written or online reports</p>		
5.8	Governing board members have been provided with training on their duties and responsibilities within the past 2 years.	<p>Guidance</p> <ul style="list-style-type: none"> Uploaded documentation must show training occurred (including content) and that each board member has been provided with training opportunities. Documentation could include, but is not limited to, board minutes, training sign-in sheets, emails from board members stating they viewed recorded webinars, training agendas/presentation materials, and emails to board members notifying them of training opportunities. For further guidance, refer to the Community Action Partnership Technical Assistance Guide <p>Documentation used: Board minutes Documentation of board attendance at offsite training conferences/events/webinars etc.</p>		
5.9	The organization’s governing board receives programmatic reports at each regular board meeting.	<p>Guidance</p> <ul style="list-style-type: none"> No documentation upload needed, EOHLC will validate this standard through ongoing review of information uploaded in the Board Management System. Please ensure all Board Management System information is current as of the date of your assessment upload including submission of minutes as required by 760 CMR 29.06 (5). For further guidance, refer to the Community Action Partnership Technical Assistance Guide <p>Documentation used: Other written or online reports</p>		
Category Six: Strategic Planning				
6.1	The organization has an agency-wide strategic plan in place that has been approved by the governing board within the past 5 years.	<p>Guidance</p> <ul style="list-style-type: none"> For further guidance, refer to the Community Action Partnership Technical Assistance Guide <p>Documentation used: Board minutes* Strategic plan (including appendices)*</p>	<i>For FY24-26 assessments, automatically met for all CAAs (based on our approval of strategic plans submitted 2021)</i>	

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6.2	The approved strategic plan addresses reduction of poverty, revitalization of low income communities, and/or empowerment of people with low incomes to become more self-sufficient.	Guidance <ul style="list-style-type: none"> For further guidance, refer to the Community Action Partnership Technical Assistance Guide Documentation used: Strategic plan (including appendices)*	<i>For FY24-26 assessments, automatically met for all CAAs (based on our approval of strategic plans submitted 2021)</i>	
6.3	The approved strategic plan contains family, agency and/or community goals.	Guidance <ul style="list-style-type: none"> For further guidance, refer to the Community Action Partnership Technical Assistance Guide Documentation used: Strategic plan (including appendices)*	<i>For FY24-26 assessments, automatically met for all CAAs (based on our approval of strategic plans submitted 2021)</i>	
6.4	Customer satisfaction data and customer input, collected as part of the community assessment, is included in the strategic planning process.	Guidance <ul style="list-style-type: none"> For further guidance, refer to the Community Action Partnership Technical Assistance Guide Documentation used: Strategic plan (including appendices)*	<i>For FY24-26 assessments, automatically met for all CAAs (based on our approval of strategic plans submitted 2021)</i>	
6.5	The governing board has received an update(s) on progress meeting the goals of the strategic plan within the past 12 months.	Guidance <ul style="list-style-type: none"> Please provide documentation that a copy of the most recent Community Action Plan progress report (Period 2 or 3) submitted to EOHLC was provided to the board for review per the CSBG contract Scope of Services (Section D.9.b.) Note: Community Assessment Report and Strategic Plan goals are directly linked to the Massachusetts Community Action Plan by design therefore EOHLC considers the standard met when, at minimum, Community Action Plan Period 2 and 3 progress reports are provided to the board. For further guidance, refer to the Community Action Partnership Technical Assistance Guide Documentation used: Board minutes		
Category Seven: Human Resource Management				
7.1	The organization has written personnel policies that have been reviewed by an attorney and approved by the governing board within the past 5 years.	Guidance <ul style="list-style-type: none"> Documentation uploaded must 1.) Specify the attorney reviewed the personnel policies and 2.) Note the date(s) the review was completed. For further guidance, refer to the Community Action Partnership Technical Assistance Guide Documentation used: Board minutes* Employee handbook/personnel policies* Statement/invoice from an attorney reflecting the review*		

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7.2	The organization makes available the employee handbook (or personnel policies in cases without a handbook) to all staff and notifies staff of any changes.	<p>Guidance</p> <ul style="list-style-type: none"> • Uploaded documentation must show three things: (1) Personnel Policies (or Employee Handbook) that include a signatory page or other form of acceptance by staff; (2) an identified process for notifying staff of updates; and (3) documentation of the location and availability of the Personnel Policies. • For further guidance, refer to the Community Action Partnership Technical Assistance Guide <p>Documentation used: Employee handbook/personnel policies Other written or online reports</p>		
7.3	The organization has written job descriptions for all positions, which have been updated within the past five years.	<p>Guidance</p> <ul style="list-style-type: none"> • Please upload the most recent (dated) organizational chart along with a sample of at least 8 job descriptions including those for the: ED/CEO, Deputy (if applicable), CFO, HR Director, and Planner. • Each job description must include the last date of review/update and should align to the uploaded organizational chart. • For further guidance, refer to the Community Action Partnership Technical Assistance Guide <p>Documentation used: Job Descriptions Organizational chart/staff list</p>		
7.4	The governing board conducts a performance appraisal of the CEO/executive director within each calendar year.	<p>Guidance</p> <ul style="list-style-type: none"> • Please refer to MA CSBG Information Memorandum 2018-04 (a copy of the IM is available in the "Guidance" folder on the blue task bar). • For further guidance, refer to the Community Action Partnership Technical Assistance Guide <p>Documentation used: Board minutes</p>		
7.5	The governing board reviews and approves CEO/executive director compensation within every calendar year.	<p>Guidance</p> <ul style="list-style-type: none"> • Please refer to MA CSBG Information Memorandum 2018-04 (a copy of the IM is available in the "Guidance" folder on the blue task bar) • For further guidance, refer to the Community Action Partnership Technical Assistance Guide <p>Documentation used: Board minutes</p>		

7.6	The organization has a policy in place for regular written evaluation of employees by their supervisors.	<p>Guidance</p> <ul style="list-style-type: none"> For further guidance, refer to the Community Action Partnership Technical Assistance Guide <p>Documentation used: Evaluation process/policy (likely found in personnel policies and procedures)</p>		
7.7	The organization has whistleblower policy that has been approved by the governing board.	<p>Guidance</p> <ul style="list-style-type: none"> For further guidance, refer to the Community Action Partnership Technical Assistance Guide <p>Documentation used: Board minutes* Other written or online reports* Whistleblower policy*</p>		
7.8	All staff participates in a new employee orientation within 60 days of hire.	<p>Guidance</p> <ul style="list-style-type: none"> Please upload all the following: 1.) the agency's policy related to orientation (per CSBG Information Memorandum 2023-04, the policy must be incorporated into the board approved HR Manual/Employee Handbook and specify a timeframe of 60 days or less in which the agency commits to conducting orientation); and 2.) documentation for most recently hired staff members (no more than 10) since the agency's last Organizational Standards assessment. Documentation should show date of hire and date of orientation for each recently hired staff member. For further guidance, refer to the Community Action Partnership Technical Assistance Guide <p>Documentation used: Orientation materials Other written or online reports</p>		
7.9	The organization conducts or makes available staff development/training (including ROMA) on an ongoing basis.	<p>Guidance</p> <ul style="list-style-type: none"> Documentation uploaded must 1.) be recent/as of the agency's last assessment and 2.) show how training was made available to staff and/or show staff attended training. For ROMA development/training, EOHLIC will consider documentation uploaded to Standard 4.3 showing a ROMA certified person is currently on staff as meeting the requirement. If your agency does not have a ROMA certified person currently on staff and/or contracts for those services, you must upload other documentation showing how ROMA training was otherwise conducted/made available to staff. For further guidance, refer to the Community Action Partnership Technical Assistance Guide <p>Documentation used: Documentation of trainings: presentations, evaluations, attendee lists, Training plan(s)</p>		

Category Eight: Financial Operations and Oversight

8.1	The organization’s annual audit (or audited financial statements) is completed by a Certified Public Accountant on time in accordance with Title 2 of the Code of Federal Regulations, Uniform Administration Requirements, Cost Principles, and Audit Requirement (if applicable) and/or State audit threshold requirements.	<p>Guidance</p> <ul style="list-style-type: none"> Per CSBG Fiscal Information Memorandum 2024-01 (copy available in the “Guidance” folder on the blue task bar), please be sure the Audit Report uploaded is 1.) identical to the Report submitted to the Federal Audit Clearinghouse within the time period allotted and 2.) includes both the audited Financial Statements and Federal/State Single Audits. If the agency received a federal extension approval, please upload documentation. For further guidance, refer to the Community Action Partnership Technical Assistance Guide <p>Documentation used: Completed audit Other written or online reports</p>		
8.2	All findings from the prior year’s annual audit have been assessed by the organization and addressed where the governing board has deemed it appropriate.	<p>Guidance</p> <ul style="list-style-type: none"> If there were no findings, write “No Findings” in the comments section. If there were findings, specify in the comments section whether a corrective action plan was prepared and, if so, upload minutes showing the corrective action plan was reviewed with the governing board. For further guidance, refer to the Community Action Partnership Technical Assistance Guide <p>Documentation used: Board minutes</p>		
8.3	The organization’s auditor presents the audit to the governing board.	<p>Guidance</p> <ul style="list-style-type: none"> Documentation must show the auditor presented to the full governing board, not just the finance/audit committee. For further guidance, refer to the Community Action Partnership Technical Assistance Guide <p>Documentation used: Board minutes</p>		
8.4	The governing board formally receives and accepts the audit.	<p>Guidance</p> <ul style="list-style-type: none"> For further guidance, refer to the Community Action Partnership Technical Assistance Guide <p>Documentation used: Board minutes</p>		

8.5	The organization has solicited bids for its audit within the past five years.	<p>Guidance</p> <ul style="list-style-type: none"> Per CSBG Fiscal Information Memorandum 2024-01 (copy available in the "Guidance" folder on the blue task bar), documentation uploaded must include all of the following: 1.) dated copy of the last published Request for Proposals (RFP) prepared by the agency and submitted to prospective providers of auditing services, 2.) list of CPA firms responding to the agency's RFP*, 3.) Scoring grid or Evaluation sheet by entity's personnel responsible for review of the proposals (include scoring criteria) and the firms names or pricing can be redacted from the scoring grid, and 4.) minutes of Governing Board meeting documenting acceptance of Auditor bid recommendation. *Please note: The bidders' full proposal submission is not required to be uploaded. Simply submit a copy of the first two pages of the vendor RFP or a certification of submission from the firm. If an agency is in-between audit bidding cycles application of the updated IM guidance will be deferred until the next bidding selection process is completed. For further guidance, refer to the Community Action Partnership Technical Assistance Guide <p>Documentation used: Documentation of bid process, including RFP/RFQ, list of vendors receiving notice, proof of any publication of the process Organization procurement policy Other written or online reports</p>		
8.6	The IRS Form 990 is completed annually and made available to the governing board for review.	<p>Guidance</p> <ul style="list-style-type: none"> Please refer to CSBG Fiscal Information Memorandum 2024-01 (copy available in the "Guidance" folder on the blue task bar). To document compliance with this Standard the agency must provide evidence the 990 Report was provided to every Board member for review. There are 3 options for documentation, however, each option must be MADE AVAILABLE TO EVERY BOARD MEMBER. Options for documentation include: 1.) an email to every member of the Board with required forms attached OR 2.) physical signature log documenting each Board member attesting that the IRS Form 990 was made available for review OR 3.) approved minutes of the Agency's Governing Board documenting that the Form 990 was made available to all members for review prior to submission. For further guidance, refer to the Community Action Partnership Technical Assistance Guide <p>Documentation used: Board minutes IRS Form 990</p>		

8.7	The governing board receives financial reports at each regular meeting that include the following: 1. Organization-wide report on revenue and expenditures that compares budget to actual, categorized by program; and 2. Balance sheet/statement of financial position.	<p>Guidance</p> <ul style="list-style-type: none"> Per CSBG Fiscal Information Memorandum 2024-01 (copy available in the "Guidance" folder on the blue task bar), upload the financial reports submitted to the Board of Directors at its most recent regular meeting. The financial reports uploaded for Standard 8.7 should be identical to the financial reports uploaded to the CSG Board Management portal. Program Cost Centers displayed in the uploaded Financial Report should be consistent with the Cost Center headings displayed in the agency's original or revised approved budget. For further guidance, refer to the Community Action Partnership Technical Assistance Guide Documentation used: Financial reports Other written or online reports 		
8.8	All required filings and payments related to payroll withholdings are completed on time.	<p>Guidance</p> <ul style="list-style-type: none"> Please upload documentation of the agency's most recent federal and state filings/payments, including Forms 940 & 941. For further guidance, refer to the Community Action Partnership Technical Assistance Guide <p>Documentation used: Insurance documentation (health, disability, flex accounts) Payroll tax documentation/filings Record of payments to state, federal, insurance and retirement accounts Retirement accounts documentation</p>		
8.9	The governing body annually approves an organization-wide budget.	<p>Guidance</p> <ul style="list-style-type: none"> Per CSBG Fiscal Information Memorandum 2024-01 (copy available in the "Guidance" folder on the blue task bar), the budget uploaded should be presented in a functional format that displays the allocation of revenue and expenses by program and administrative cost centers. Program Cost Centers displayed in the uploaded Financial Report (8.7) should be consistent with the Cost Center headings displayed in the agency's original or revised approved budget (8.9). For further guidance, refer to the Community Action Partnership Technical Assistance Guide <p>Documentation used: Agency-wide budget* Board minutes*</p>		

8.10	The fiscal policies have been reviewed by staff within the past 2 years, updated as necessary, with changes approved by the governing board.	<p>Guidance</p> <ul style="list-style-type: none"> • Per CSBG Fiscal Information Memorandum 2024-01 (copy available in the “Guidance” folder on the blue task bar), to ensure all updates/changes are easily identifiable, please highlight, bookmark or underline policy changes and including page numbers of manual/handbook updates. • Be sure to upload approved Board minutes documenting approval of the fiscal policies in their entirety. In addition, if a draft manual is uploaded to identify policy changes, please also upload the final, approved version of the manual. • For further guidance, refer to the Community Action Partnership Technical Assistance Guide <p>Documentation used: Board minutes* Fiscal policies/procedures manual*</p>		
8.11	A written procurement policy is in place and has been reviewed by the governing board within the past 5 years.	<p>Guidance</p> <ul style="list-style-type: none"> • For further guidance, refer to the Community Action Partnership Technical Assistance Guide <p>Documentation used: Board minutes* Procurement policy*</p>		
8.12	The organization documents how it allocates shared costs through and indirect cost rate or through a written cost allocation plan.	<p>Guidance</p> <ul style="list-style-type: none"> • For further guidance, refer to the Community Action Partnership Technical Assistance Guide <p>Documentation used: Cost allocation plan Other written or online reports</p>		
8.13	The organization has a written policy in place for record retention and destruction.	<p>Guidance</p> <ul style="list-style-type: none"> • Please refer to CSBG Fiscal Information Memorandum 2024-01 (copy available in the “Guidance” folder on the blue task bar). • Records can take the form of paper or electronic. The policy needs to include a definition of what is considered a record. In order to be complete, the policy should include both paper and electronic records. • The standard requires the policy include retention and destruction of records. When records are no longer to be kept, the standard requires a description of how they will be destroyed to be part of the policy. • For further guidance, refer to the Community Action Partnership Technical Assistance Guide <p>Documentation used: Documentation retention and destruction policy Other written or online reports</p>		

Category Nine: Data and Analysis

9.1	The organization has a system or systems in place to track and report client demographics and services customers receive.	Guidance <ul style="list-style-type: none"> No documentation upload needed, EOHLIC will validate this standard through the agency's use of E-Gov 	<i>For FY26-CAAs automatically meet</i>	
9.2	The organization has a system in place to track family, agency, and/or community outcomes.	Guidance <ul style="list-style-type: none"> No documentation upload needed, EOHLIC will validate this standard through the agency's use of E-Gov 	<i>For FY26-CAAs automatically meet</i>	
9.3	The organization has presented to the governing board for review or action, at least within the past 12 months, an analysis of the agency's strategic program adjustments and improvements identified as necessary.	Guidance <ul style="list-style-type: none"> Please provide documentation that a copy of the most recent Community Action Plan progress report (Period 2 or 3) submitted to EOHLIC was provided to the board for review per the CSBG contract Scope of Services (Section D.9.b.) Note: Community Assessment Report and Strategic Plan goals are directly linked to the Massachusetts Community Action Plan by design therefore EOHLIC considers the standard met when, at minimum, Community Action Plan Period 2 and 3 progress reports are provided to the board. For further guidance, refer to the Community Action Partnership Technical Assistance Guide <p>Documentation used: Board minutes* Other written or online reports*</p>		
9.4	The organization submits its annual CSBG Informational Survey data report and it reflects client demographics and organization-wide outcomes.	Guidance <ul style="list-style-type: none"> No documentation upload needed, EOHLIC will validate this standard through the agency's submission of the most recent CSBG Annual Report. 	<i>For FY26-CAAs automatically meet</i>	

Other State and Federal Compliance Standards

Governance					
Standard	Guidance, Acceptable Documentation, etc.	Program Representative Review List	Y/N, N/A	Comment	Onsite Notes
<p>10.1 Bylaws include all requirements pursuant to 760 CMR 29.06 (5) and (6)”</p> <p style="color: #a52a2a; font-weight: bold; margin-top: 20px;">COMPLIANCE IN POLICY/PROCEDURES</p>	<p style="color: #008000; font-weight: bold;">Documentation used:</p> <p style="color: #008000;">Board bylaws Other written or online reports*</p>	<p>Pursuant to 760 CMR 29.06 (5), do the Bylaws include:</p> <p>(a) The total number of seats on board and allotment to public, representatives of low-income persons, and private sectors</p> <p>(b) Procedures for selecting board members in accordance with 760 CMR 29.06</p> <ul style="list-style-type: none"> • Do low-income representatives come to the Board of Directors by (select all that apply): <ul style="list-style-type: none"> <input type="checkbox"/> Nomination and elections within the neighborhoods <input type="checkbox"/> Selection at an adequately publicized meeting of low-income persons <input type="checkbox"/> Selection on a small area basis (by city block or town) of representatives who in turn select members for the Board of Directors <input type="checkbox"/> The entity board recognizes groups or organizations composed of primarily of low-income persons and representing the interests of the low-income population of which the membership may select one or more representatives to the entity’s board. • Are low-income elected members elected by those living at 175% or below FPL or those low-income members nominated by a board composed primarily of (i.e. – more than 50%) low-income persons? <input type="checkbox"/>Yes <input type="checkbox"/>No <input type="checkbox"/>N/A <p>(c) Description of board performance standards (e.g. conduct, attendance, grounds for removal)</p> <p>(d) Description of procedures in case of removal</p> <ul style="list-style-type: none"> • Procedure assures only reps. of public officials can be removed, not the official themselves? <input type="checkbox"/>Yes <input type="checkbox"/>No 	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>		

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<p>10.1 cont.</p>			<p>(e) Procedures for selecting new board members in the case of vacancy</p> <ul style="list-style-type: none"> • The procedure for LI vacancy is either (select): <ul style="list-style-type: none"> <input type="checkbox"/> Any of the 4 procedures listed in (b) above are repeated or <input type="checkbox"/> Remaining LI representatives select a replacement for remainder of the term • Procedure for seat of a representative of a group is the board asks the organization to select another representative to serve the remainder of the term. <input type="checkbox"/>Yes <input type="checkbox"/>No <input type="checkbox"/>N/A • Procedure for representative of public official is the Board requests the public official name a replacement. <input type="checkbox"/>Yes <input type="checkbox"/>No • Procedures specify a board vacancy cannot remain open more than 180 days? <input type="checkbox"/>Yes <input type="checkbox"/>No <input type="checkbox"/>N/A <p>(f) A description of selection method and requirements of alternates?</p> <ul style="list-style-type: none"> • Description indicates that Reps. of Public Officials cannot select an alternate? <input type="checkbox"/>Yes <input type="checkbox"/>No <input type="checkbox"/>N/A • Description for LI and/or Private Sector alternates indicates: they are selected at same time/manner as the member, their selection is reflected in the records, they cannot vote/count towards quorum if the member is also at the meeting, and they cannot hold office on board. <input type="checkbox"/>Yes <input type="checkbox"/>No <input type="checkbox"/>N/A <p>(g) Procedures for Board Meetings include all the following (select if included)</p> <ul style="list-style-type: none"> <input type="checkbox"/> Quorum = 50% of filled board seats <input type="checkbox"/> Board meets at least 6 times annually <input type="checkbox"/> CAA provides written notice and an agenda to all board members at least 7 days in advance <input type="checkbox"/> CAA provides public notice of meeting at least 5 days in advance 	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>		
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Fiscal

Standard		Guidance, Acceptable Documentation, etc.	Program Representative Review List	Y/N, N/A	Comment	Onsite Notes
11.1	<p>The organization maintains written financial procedures which conform to the terms laid out in their CSBG contract with EOHLC and relevant requirements of 2 CFR 200.</p> <p>COMPLIANCE IN POLICY/PROCEDURES</p>	<p>Guidance</p> <ul style="list-style-type: none"> Please upload the agency financial policies/procedures manual as well as the completed "EOHLC Fiscal Monitoring Form" <p>Documentation used: Fiscal policies/procedures manual* Other written or online reports*</p>	<ul style="list-style-type: none"> ➤ Refer to Fiscal Compliance Unit ➤ Areas of review include: <ul style="list-style-type: none"> • Annual Audit • Required Policies and Procedures • Equipment Records • Sub-Contracts 	<input type="checkbox"/> Yes <input type="checkbox"/> No		
11.2	<p>The organization adheres to their written financial procedures, terms laid out in their CSBG contract with EOHLC and relevant requirements of 2 CFR 200.</p> <p>COMPLIANCE IN PRACTICE</p>	<p>Guidance</p> <ul style="list-style-type: none"> Please upload current documentation of the agency's inventory listing, insured fidelity bond, and interest on federal funds. In addition to documentation uploaded, EOHLC will validate this standard through onsite fiscal review. <p>Documentation used: Inventory Listing Fidelity Bond Interest earned on federal funds Other written or online reports*</p>	<ul style="list-style-type: none"> ➤ FISCAL COMPLIANCE UNIT CHECKS TO CONFIRM PRACTICES – Refer to Fiscal Compliance Unit for findings ➤ Areas of review include: <ul style="list-style-type: none"> • Cash Receipt and Cash Management • Procurement • Cash Disbursement • Credit Cards • Travel Expenses • Personnel System and Practice • Petty Cash • Financial Reporting 	<input type="checkbox"/> Yes <input type="checkbox"/> No		
11.3	<p>Pursuant to 760 CMR 29.03 (2), CSBG funds are only allocated to programs and activities that serve the designated service area.</p>	<p>Guidance</p> <ul style="list-style-type: none"> No documentation upload needed, EOHLC will validate this standard through ongoing review of reports submitted through E.Gov. <p>Documentation used: Other written or online reports*</p>	<ul style="list-style-type: none"> ➤ Areas of review include: <ul style="list-style-type: none"> • Community Action Plans (<i>which programs and activities funds are allocated to; descriptions provided</i>) • Organization-wide budget (<i>Standard 8.9</i>) • CSBG Fiscal Reporting • Eligibility policy/procedures (<i>Standard 13.2</i>) 	<input type="checkbox"/> Yes <input type="checkbox"/> No		

Human Resources

Standard		Guidance, Acceptable Documentation, etc.	Program Representative Review List	Y/N, N/A	Comment	Onsite Notes
12.1	<p>Pursuant to 760 CMR 29.07 (4), the Personnel Policy includes, but is not limited to, procedures for hiring, conducting an annual evaluation of, and the suspension and termination of the executive director/CEO.</p> <p>COMPLIANCE IN POLICY/PROCEDURES</p>	<p>Guidance</p> <ul style="list-style-type: none"> Please upload the Human Resources Policy Manual and denote the applicable page number. <p>Documentation used: Human Resources Policy Manual with page number noted where ED/CEO procedures are included Other written or online reports*</p>		<input type="checkbox"/> Yes <input type="checkbox"/> No		
12.2	<p>The agency adheres to its own Personnel Policies.</p> <p>COMPLIANCE IN PRACTICE</p>	<p>Guidance</p> <ul style="list-style-type: none"> Please upload the Organizational chart (with staff names and titles) or staff list. EOHLC will validate this standard through review of Key Informant surveys and an onsite file review. <p>Documentation used: Other written or online reports*</p>	<ul style="list-style-type: none"> ➤ Cross-check response to question #17 on HR Survey regarding staff evaluations completed. ➤ Using org. chart/staff listing provided by agency, prepare a list of 10 names (ED included) of files to <u>review onsite</u>. For detailed instructions, see the HR Employee File Review Form and the HR Files Requested ➤ CHECK HR FILES ONSITE TO CONFIRM PRACTICE 	<input type="checkbox"/> Yes <input type="checkbox"/> No		
12.3	<p>Pursuant to Massachusetts CSBG Information Memorandum 2013-01, confidential material/information is stored in separate confidential files and not in the general personnel files.</p>	<p>Guidance</p> <ul style="list-style-type: none"> Please upload the Organizational chart (with staff names and titles) or staff list. EOHLC will validate this standard through onsite file review. <p>Documentation used: Organizational chart/staff list Other written or online reports*</p>	<ul style="list-style-type: none"> ➤ CHECK HR FILES ONSITE TO CONFIRM PRACTICE 	<input type="checkbox"/> Yes <input type="checkbox"/> No		

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Operational Management

Standard		Guidance, Acceptable Documentation, etc.	Program Representative Review List	Y/N, N/A	Comment	Onsite Notes
13.1	Per MA CSBG Information Memorandum 2009-01, the agency has a written Child Care Support Services Referral Policy that complies with Section 678.G (b) of the <i>CSBG Act</i> .	<p>Guidance</p> <ul style="list-style-type: none"> Please upload the Child Support Referral Policy A copy of the IM is available in the "Guidance" folder on the blue task bar <p>Documentation used: Child Support Referral Policy</p>	<ul style="list-style-type: none"> The agency has a written policy that complies with the Act 	<input type="checkbox"/> Yes <input type="checkbox"/> No		
13.2	Pursuant to 760 CMR 29.07 (5), the organization maintains written policies and procedures sufficient to determine recipient income eligibility for services. <i>COMPLIANCE IN POLICY/PROCEDURES</i>	<p>Guidance</p> <ul style="list-style-type: none"> Please upload the income eligibility policy/procedures and ensure they cover all services funded by CSBG. <p>Documentation used: Income Eligibility Policy</p>	<ul style="list-style-type: none"> Is the written policy/procedure sufficient to determine recipient income eligibility at or below the current CSBG threshold? Does it include a policy/procedure for generally verifying income eligibility for services with limited intake procedures (ex. – food pantries)? Review responses to Planner Survey (#14) and ED/CEO Survey (#18) 	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		
13.3	The agency adheres to its policies and procedures for determining recipient income eligibility for services. <i>COMPLIANCE IN PRACTICE</i>	<p>Guidance</p> <ul style="list-style-type: none"> EOHLC will validate this through onsite review of client file documentation <p>Documentation used: Other written or online reports*</p>	<ul style="list-style-type: none"> Does selected documentation reflect clients served by CSBG funded programs? Does documentation show income eligible residents were served? Does documentation reflect the agency adhered to its own policies? 	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No		

This form is only for the internal use of EOHLC staff working with the CSBG program

13.4	The organization has a written, comprehensive information security program that satisfies requirements specified in 201 CMR 17.00	<p>Guidance</p> <ul style="list-style-type: none"> Please upload the Written Information Security Plan (WISP) For further guidance, refer to the 201 CMR 17.00 Compliance Checklist <p>Documentation used: Written Information Security Plan (WISP)</p>	<p>➤ Did the agency submit a WISP?</p> <p>➤ Does the WISP address the following items from the 201 CMR 17.00 Compliance Checklist ?</p> <ul style="list-style-type: none"> Includes administrative, technical, and physical safeguards for PI protection One or more employees designated to maintain and supervise WISP implementation and performance Includes regular ongoing employee training, and procedures for monitoring employee compliance Is reviewed at least annually, or whenever there is a material change in business practices that may affect the security or integrity of PI records Includes a procedure for documenting any actions taken in connection with any breach of security; and the procedure requires a post-incident review of events and actions taken to improve security 	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No		
13.5	Pursuant to Section 678F(b)(2) of the CSBG Act and in accordance with CSBG IM #81 the agency does not use CSBG funds to support partisan or non-partisan political (e.g., voter registration, transportation to polls, etc.) activities.	<p>Guidance</p> <ul style="list-style-type: none"> No documentation upload needed, EOHLC will validate this through review of Key Informant Surveys For further guidance, refer to CAPLAW's CAA Leader's Legal Guide <p>Documentation used: Other written or online reports*</p>	<p>➤ CHECK SURVEY RESPONSES: ED (#20) & BOD PRESIDENT (#9) - Per survey responses, is the agency engaging in partisan or non-partisan political activities including elections, election forums, voter registration, voter transportation to polls, etc.?</p> <ul style="list-style-type: none"> If yes, are CSBG funds used directly (e.g., personnel) or indirectly (e.g., space, supplies, refreshments, etc.) to finance these activities? 	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No		
13.6	Requirements pursuant to 760 CMR 29.08 regarding Citizen Access are met.	<p>Guidance</p> <ul style="list-style-type: none"> No documentation upload needed, EOHLC will validate this through review of Key Informant Surveys <p>Documentation used: Other written or online reports*</p>	<p>➤ CHECK SURVEY RESPONSE: BOD PRESIDENT (#8) - Per Board President Survey response, agency complies.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No		

Key Informant Surveys

<i>Standard</i>		<i>Guidance, Acceptable Documentation, etc.</i>	<i>Program Representative Review List</i>	<i>Y/N, N/A</i>	<i>Comment</i>	<i>Onsite Notes</i>
14.1	The agency submits completed Key Informant Surveys to EOHLC ahead of the onsite visit.	<p>Guidance</p> <ul style="list-style-type: none"> Fillable Key Informant Survey forms are available in the "Guidance" folder on the blue task bar. Please complete and upload all seven (Board President, Board Treasurer, ED-CEO, Fiscal Director-CFO, Human Resources, MIS, and Planner). Note: surveys must be typed, not handwritten <p>Documentation used: DHCD Pre-Assessment Surveys</p>	➤ All completed surveys were submitted	<input type="checkbox"/> Yes <input type="checkbox"/> No		