



DEPARTMENT OF HEALTH & HUMAN SERVICES
Administration for Children and Families
Office of Community Services

Community Services Block Grant Program

Nevada State Assessment

On-Site Review

Final

September 20 - 24, 2010

Nevada State Assessment

Table of Contents

I. EXECUTIVE SUMMARY	1
State Assessment Authority.....	1
Methodology.....	2
II. ASSESSMENT AND FINDINGS.....	3
• FISCAL AND GOVERNANCE OPERATIONS.....	3
Administrative Monitoring and Accountability.....	4
Financial Monitoring and Accountability.....	4
OMB Circular A-133.....	6
Recapture and Redistribution.....	6
Carryover Balance.....	6
Public Hearings.....	7
Tripartite Boards.....	7
Additional Administrative or Fiscal Operations Findings.....	8
• PROGRAM OPERATIONS.....	9
Employment Programs.....	11
Education Programs.....	11
Housing Programs.....	12
Emergency Services Programs.....	12
Nutrition Programs.....	12
Self-Sufficiency Programs.....	13
Health Programs.....	13
Income Management Programs.....	13
Linkages.....	14
Programs for Youth and Seniors.....	14
Local Agency Uses of FY 2007 CSBG Funds	15
Results Oriented Management and Accountability (ROMA) System.....	15
III. COMMUNITY ACTION AGENCIES (CAAs) ON-SITE REVIEW SUMMARIES.....	16
IV. ASSESSMENT FINDINGS AND RECOMMENDATIONS.....	17

Tables

Table 1 - Use of FY 2007 Funds.....3

Table 2 - Client Characteristics and Statistics11

Nevada Community Services Block Grant

I. Executive Summary

The Community Services Block Grant (CSBG) program provides assistance to States and local communities, working through a network of Community Action Agencies (CAAs) and other neighborhood-based organizations, for the reduction of poverty, the revitalization of low-income communities, and the empowerment of low-income families and individuals to become fully self-sufficient. CSBG-funded programs create, coordinate, and deliver a broad array of programs and services to low-income Americans. The grant's purpose is to fund initiatives to change conditions that perpetuate poverty, especially unemployment, inadequate housing, poor nutrition, and lack of educational opportunity.

The Governor of Nevada designated the Nevada Department of Health and Human Services as the appropriate lead agency for the administration of the CSBG program. The Nevada CSBG program provides funding, technical assistance, and support to 42 eligible entities serving 67 counties. The CAAs provide an array of services according to the Community Action Plan (CAP) formulated to address local needs. Services may include housing, energy assistance, nutrition, employment and training as well as transportation, family development, child care, health care, emergency food and shelter, domestic violence prevention services, money management, and micro-business development. The information contained in this report was compiled during a State Assessment (SA) of the Nevada CSBG program and its eligible entities as evaluated by Federal staff of the Division of State Assistance (DSA) in the Office of Community Services (OCS), an office within the Administration for Children and Families (ACF), U.S. Department of Health and Human Services (HHS).

State Assessment Authority

SAs are conducted to examine the implementation, performance, compliance, and outcome of a State's CSBG program to certify that the State is adhering to the provisions set forth in Sections 678B and 676(b) of the Coats Human Services Reauthorization Act, Public Law 105-285. On December 21, 2007, OCS issued Information Memorandum 105, explaining that DSA would conduct both on-site and desk monitoring visits during Federal Fiscal Years (FFYs) 2008-2010. Federal staff conducted an on-site review of the Nevada CSBG program and its eligible entities from September 20 - September 24, 2010. The evaluation included interviews and analyses of the data collected. As per the statute, the SA examines the States and its eligible entities' assurances of program operations including:

1. Activities designed to assist and coordinate services to low-income families and individuals, including those receiving assistance under the Temporary Assistance to Needy Families (TANF) program, the elderly, homeless, migrant and seasonal workers, and youth;
2. Coordination of service delivery to ensure linkages among services, such as employment and training activities, with the Low-Income Home Energy Assistance Program (LIHEAP), with faith-based and other community-based charitable organizations, and other social services programs;
3. Innovative approaches for community and neighborhood-based service provision;
4. Ability to provide emergency food and nutrition to populations served;
5. Adherence to statutory procedures governing the termination and reduction of funding for the local entity administering the program;

6. Adequate and appropriate composition of Tripartite Board and CAA rules;
7. Appropriate fiscal and programmatic procedures to include a Community Action Plan from the CAAs that identifies how the needs of communities will be met with CSBG funds; and
8. Participation in the performance measurement system, the Results Oriented Management and Accountability (ROMA) initiative.¹

The SA also examines the fiscal and governance issues of the eligible entities that provide CSBG funded services in local communities, as well as the State's oversight procedures for the eligible entities. Fiscal and governance issues examined include:

1. Methodology for distribution and disbursement of CSBG funds to the eligible entities;
2. Fiscal controls and accounting procedures;
3. State administrative expenses;
4. Mandatory public hearings conducted by the State Legislature; and
5. General procedures for governing the administration of the CSBG program, including Board governance, non-discrimination provisions, and political activities prohibitions.

Methodology

The State Assessment consisted of two levels of evaluation by OCS reviewers:

1. OCS reviewers examined the State-level assurances, fiscal and administrative governance issues through data collection and interviews with State officials.
2. OCS reviewers assessed the State's monitoring procedures and results to determine CAA's compliance with assurances and governance requirements by gathering information and engaging in data collection and interviews.

State-level interviews included the following NDHHS officials: Gary Gobelman, CSBG Program Manager; Mary Liveratti, Deputy Director of NV Department of Health and Human Services; Mike Torvinen, Deputy Director Fiscal Services; Shawna DeRousse, Administrative Officer III; Melani Clemens, Administrative Officer I; Laurie Olson, Chief Grants Management Unit.

OCS reviewers assessed the following entities: Churchill County Department of Social Services, Carson City, NV; Lyon County Human Services, Silver Springs, NV; Community Services Agency and Development Corporation, Reno, NV.

OCS reviewers included: Isaac Davis, Program Specialist and Team Leader; Michael Pope, Financial Analyst; and Emmanuel Djokou, Auditor.

¹ Some assurances have been combined where appropriate.

II. Assessment and Findings

The OCS reviewers collected information pertaining to the fiscal and programmatic procedures of the State agency, as well as other general information about the State's programs including:

- Administrative, programmatic, and financial operations for the State and the CAAs assessed;
- Brochures and literature on services provided;
- Most recent CSBG financial summary reports;
- Standard Form (SF) 269 Financial Status Report for Fiscal Year (FY) 2007 showing total funds authorized;²
- Audited Financial Statements;
- Nevada State CSBG Plan; and
- Nevada CSBG Operations Manual.

Fiscal and Governance Operations

The CSBG statute requires each State to designate a lead agency to administer the CSBG program and for the lead agency to provide oversight of the eligible entities that administer programs in the communities. In FY 2007, the State allocated 94 percent of CSBG funds to its eligible entities and CAAs. The State used five percent for administrative activities and one percent as discretionary funds, which were distributed to selected eligible entities.

Table 1 illustrates the distribution of Federal funds allocated in Nevada.

Table 1

Use of FY 2007 Funds: Nevada		
Uses of Funds	Amount Allocated	Percentage of Allocation
Grants to Local Eligible Entities	\$3,700,042	93%
Administrative Costs	\$ 132,528	3%
Discretionary Projects	\$ 147,865	4%
Total in FY 2007	\$3,980,435	100%

According to the State, administrative expenditures were for the management and monitoring oversight of the program. Through interviews with the State and a review of discretionary projects, OCS reviewers were unable to determine how State discretionary funds were being used. According to the State, discretionary funds were used for special projects under the Governor's Office. OCS reviewers were unable to determine the exact nature of these projects or if these projects were in accordance to Section 675C of the CSBG Act.

² The SF 269—Short Form is used to report the amount of program income earned and the amount expended.

Administrative Monitoring and Accountability

The CSBG statute requires States to monitor local agencies to determine whether they meet performance goals, administrative standards, and financial management standards, as well as other State-defined criteria. The State has procedures in place to ensure the CAAs have a system of governance, financial and human resource management, program and service delivery, and community relations. The State requires the CAAs to submit applications to receive their CSBG allotments annually. The process of approval is based on: 1) standard forms; 2) governing Board approval; and 3) information about how the entity will provide services in their communities.

Financial Monitoring and Accountability

States are required by Federal statute to perform monitoring duties in a full on-site review at least once every three years for each eligible entity. A draft monitoring report is developed and issued within 30 days of the on-site visit. The report identifies deficiencies, issues, and concerns requiring corrective action(s) as approved by the board. Follow-up visits are coordinated with the CAA if deficiencies were noted during the on-site visit. A final report is sent to the Board Chairperson and the Executive Director of the agency. Not all site visits require a focus on the entire CSBG program. Some may focus on specific areas during the State's assessment review of other Federal grant programs such as the LIHEAP, the ROMA performance measurement system, board issues, or Training and Technical Assistance(T&T/A).

Section 678B(a)(1) requires that the State shall conduct the following reviews of eligible entities:

- (1) A full on-site review of each such entity at least once during each three-year period.
- (2) An on-site review of each newly designated entity immediately after the completion of the first year in which such entity receives funds through the CSBG program.

The NVDHHS CSBG Policies outlines the State's monitoring procedures and objectives. The Grants Management Unit (GMU) is responsible for conducting on-site program monitoring visits at least once every two years, according to State policies. On-site monitoring reviews are conducted to meet the following objectives: review of sub-recipient performance; review of compliance to applicable State and Federal regulations, policies, and statutes; to prevent fraud and abuse; and identification of technical assistance needs. However, through a review of State CSBG files, OCS reviewers did not find evidence of State monitoring visits in FY 2007.

OCS reviewers examined the State's monitoring procedures and a representative sample of completed monitoring tools, reports, backup documentation, and corrective action letters. Through documentation reviews and interviews with State staff responsible for monitoring, OCS reviewers determined that the State does not have reasonable and responsible internal controls for conducting monitoring reviews for its eligible entities. The State did not conduct any monitoring visits of eligible entities in 2007. As a result, OCS reviewers determined the State is not in compliance with Section 678B of the CSBG Statute which mandates "A full onsite review of each such entity at least once during each three-year period."

Further, State monitoring did not comply with CSBG statutes regarding: 1) monitoring each agency at least once during each three-year period; 2) onsite reviews of each newly designated entity immediately after the completion of the first year the agency receives funding; or 3) follow up reviews, including prompt return visits to eligible entities, and their programs that fail to meet the goals, standards, and requirements established by the State.

OCS reviewers also determined that the State was in compliance with Section 676A. The State did have policies and procedures for the designation and de-designation of eligible entities in unserved areas. However, a review of one newly designated eligible entity during the 2007 program year determined that the State did not conduct an onsite review of the newly designated entity immediately after the completion of the first year in which such entity receives funds through the CSBG program, as required by Section 676B(2) of the CSBG Act.

The State's CSBG program year is from July 1 through June 30. The State operates on a cost reimbursement basis with its eligible entities, and monthly financial status reports are the primary tools for evaluating allowable expenditures and tracking budget line items. Monthly expenditure reports from eligible entities are reviewed by fiscal staff before payments are processed. The GMU is responsible for the examination of all State funding awarded to the eligible entities.

NVDHHS is the central administrative agency for the State. The State Accounting office is responsible for the collection and reporting of financial information and the processing of financial transactions.

During our review of information, interviews with state employees, and observation of the use of the Integrated Financial System (IFS) and the Nevada Executive Budget System (NEBS), we were able to determine that certain forms of controls such as input authorization, missing data tests, error resubmission, centralized policies and procedures, systems training, and access control and authorization exist.

OCS reviewers examined the State's internal audit process and the sub-recipient monitoring process. The internal audit process is to examine, evaluate and report on its internal controls including information systems and to evaluate compliance with the policies and procedures that comprise controls. OCS reviewers noted no findings in the State's A-133 audit reports pertaining to the CSBG program. Based on our review of information and interviews with State employees, the State does not have written guidance for incorporating audit findings in its decision-making process.

State audit policies require all agencies, units, and Divisions of the Department to submit to the Director all State, Federal, and other independent audit reports within 5 days of receipt. The Director's Office shall maintain audit files for all of its constituent agencies. Corrective Action Plans will be developed by the Divisions in compliance with the respective audit agency's requirements. Corrective Action Plans and implementation reports will be reviewed by the Deputy to ensure they are responsive to the audit recommendation.

Office of Management and Budget (OMB) Circular A-133, Single Audit Act of 1997

According to 45 CFR §96.31, grantees and sub-grantees are responsible for obtaining audits in accordance with OMB Circular A-133, “*Audits of State, Local Governments, and Non-Profit Organizations.*” Agencies expending \$500,000 or more in any year must contract with an independent auditor to review their financial statements and Federal expenditures. The auditing firm for the State conducts the fieldwork, issues the audit report, and submits the required reporting forms to the Federal Audit Clearinghouse (FAC) with reportable findings. The State CSBG Plan submitted to OCS requires that an audit report is prepared annually.

State audits are performed to determine whether: 1) costs and program income activities were properly summarized and reported; 2) internal controls meet the State’s standards; 3) costs charged to the grant were allowable; and 4) the State is in full financial compliance.

The State audits are conducted under the standards of the Institute of Internal Auditors. In the performance of their duties, the State’s auditing firm also considers the government auditing standards promulgated by the Comptroller General, U.S. Government Accountability Office.

OCS reviewers examined the SF-SAC Form - Data Collection Form for Reporting on Audits of States, Local Governments, and NonProfit Organizations and the Single Audit Report found on the FAC website. OCS reviewers also recognized that the State adheres to the accounting principles and financial reporting standards established by the Governmental Accounting Standards Board.³ For FY 2007, OCS reviewers determined that the State and not all of the eligible entities were filing SAC Forms in accordance with the Federal requirements.

Recapture and Redistribution

Language in Section 675(C)(3) of the CSBG Act permits States the discretion to recapture and redistribute unobligated funds in excess of 20 percent of the amount distributed to an eligible entity to another eligible entity or to a private nonprofit organization. However, the Appropriation Act (H.R. 3061) contains new language which supersedes the language in Section 675(C)(3) of the enabling legislation. States are now required to continue recapture and/or redistribute FY 2001 CSBG funds to eligible entities in accordance with the requirement in Section 675(C)(a)(1) of the CSBG Act which requires, that, “to the extent Community Services Block Grant funds are distributed as grants by a State to eligible entities provided under the Act, and have not been expended by such entity, the funds shall remain with such entity with such entity for carryover into the next fiscal year for expenditure by such entity for program purposes.”

Carryover Balance

In accordance with 45 CFR §92.40, §92.41, and §96.30(b)(4), respectively, the grantee shall submit annual program progress and financial status reports using OMB Standard Form 269A Financial Status Report (short form). The Financial Status Reports (FSRs) are due within 90 days of the close of the applicable statutory grant periods. The Nevada FSRs were due December 30, 2007 and December 30, 2008. Failure to submit reports on time may be the basis

³ The authoritative bodies of establishing accounting principles and financial reporting standards are the Governmental Accounting Standards Board (State and local governments), and the Financial Accounting Standards Board (nongovernmental entities).

for withholding financial assistance payments, suspension, or termination of funding. During the assessment, OCS reviewers noted that the State submitted its Financial Status Reports (FSRs) in accordance with 45 CFR §92.40, §92.41, and §96.30(b)(4).

Grantees are required to adhere to a provision of the law under the Consolidated Appropriations Act of 2005, which requires that to the extent FY 2007 CSBG funds are distributed by a State to an eligible entity and have not been expended by such eligible entity, they shall remain with such eligible entity for carryover and expenditure into the next fiscal year.

The State reported a carryover balance of \$2,639,885 for FY 2007 and an unobligated balance for FY 2008. Nevada's policy on carryover funds states that eligible entities shall retain any carryover to the next program year. When a CAA has determined that it will not utilize all of the current program year funds, it will notify the State, which will re-contract the carryover funds.

Public Hearings

According to Section 676(a)(2)(B), at the beginning of each fiscal year, a State must prepare and submit an application and State Plan covering a period of one year and no more than two fiscal years. Each year, the State's CSBG State Plan is sent to the CSBG Advisory Committee, the State General Assembly, and all eligible entities. In conjunction with the development of the State Plan, the State holds at least one public hearing. According to the State Plan the Public Hearing was held at the NVDHHS in Carson City on August 12, 2005, and was teleconferenced to Las Vegas and Elko. No public comments were submitted to the State CSBG Office.

The Legislative Hearing was scheduled for October 2005 at the NDHHS in Carson City before the State Legislature's Interim Financial Committee. The most recent Legislative Hearing to date was held in September 2003 in conjunction with the 2003-2004 State Plan.

OCS reviewers assessed the State Public Hearing procedures and determined that the State was in compliance with the CSBG statute.

Tripartite Boards

The State requires CAAs to submit a listing of their Tripartite Board membership prior to being approved to administer the CSBG program. CAAs must comply with Section 676B of the CSBG Statute, which requires that members are chosen in accordance with democratic selection procedures to assure that not less than one-third of its members are representatives of low-income individuals and families who reside in the neighborhoods served. The remaining members are public officials or members of business, industry, labor, religious organizations, law enforcement, education, or other major groups interested in the community serviced. Members must actively participate in the planning, implementation, and evaluation of the program that services their low-income communities.

The CAAs must have their Tripartite Board certified annually to ensure the board has received orientation and/or training, which outlines and describes their responsibilities and liabilities. The certification of the Tripartite Board training must be documented in the Board minutes. The approved minutes must include the type of training, date(s) of the training, and meeting attendees. Additionally, certification must include an annual audit of services, expenditures, and reporting requirements for State, Federal, and other funding sources. These requirements are

included in the contract signed between the CAAs and the State, the CSBG manual, the State Plan, and the CSBG statute. The State-outlined responsibilities of the Tripartite Board include:

- Ensuring that all administrative requirements are met;
- Establishing policies, rules, regulations and by-laws consistent with the agency's mission;
- Establishing accounting systems and fiscal controls consistent with generally accepted accounting principles;
- Establishing policies prohibiting nepotism;
- Avoiding conflict of interest;
- Involvement in directing the agency's operation through regular board meetings; and
- Acceptance of liability for and resolving any questioned cost(s) identified by audits.

According to the State CSBG Policies, Tripartite Board Standards have been adopted to ensure that Nevada CAAs achieve compliance with federal CSBG regulations and guidelines. The guidelines, along with Federal Information Memorandum #82, provide the structure and guidance for CAAs to follow in establishing and operating their board.

Through interviews with State staff and a review of CAA files, OCS reviewers determined that one agency did not have an operating tripartite board, in accordance to Section 676B, prior to FY 2007. The State noted the deficiency during a review of the agency and a three member Tripartite Advisory Board was established during the program year.

Additional Administrative or Fiscal Operations Findings

The State is required to maintain a current financial procedure manual in order to meet fiscal standards set forth by Federal regulations. Financial reports are required monthly. Quarterly financial reports are due within 30 days of the end of each quarter and annual fiscal reports are required at the end of the State's fiscal year. The annual on-site compliance review conducted by the State should determine compliance to specific areas including financial compliance. Failure to comply with State and Federal reporting requirements may result in corrective action including suspension of grant awards.

According to 45 C.F.R. § 96.30, fiscal and administrative operations requirements (a) fiscal control and accounting procedures, except where otherwise required by Federal law or regulation, a State shall obligate and expend block grant funds in accordance with the laws and procedures applicable to the obligation and expenditure of its own funds. Fiscal control and accounting procedures must be sufficient to ... (b) permit the tracing of funds to a level of expenditure adequate to establish that such funds have not been used in violation of the restrictions and prohibitions of the statute authorizing the block grant.

According to CSBG statute, the State is required to have processes in place to provide oversight of CSBG funds. The OCS reviewers' analyses of the State's records and procedures that included administrative, financial, and programmatic operations, determined that the State did not demonstrate reasonable internal controls to administer the CSBG Program. OCS reviewers conducted an analysis of the State's records and procedures, which included administrative, financial, and programmatic operations and determined that the State's written policies and procedures are not in compliance with the CSBG statute. In addition, the State did not provide complete policies, procedures and records in a timely manner for the purpose of examining and verifying financial, programmatic and administrative information and processes.

Through a review of State policies and procedures and interviews with State personnel, OCS reviewers determined that the State failed to comply with Section 678G Drug and Child Support Services and Referrals. State policies did not require eligible entities to make appropriate referrals to local child support offices or inform single parent families about the availability of child support services.

Through a review of State CSBG policies, OCS reviewers determined that the State did not have policies and procedures in place that would assure compliance with CSBG Statute, Section 673(2). According to State CSBG policies, (P-07-6) Income for Families and Individuals, individuals and families receiving CSBG supported services must be below 200% of the federal poverty level established in the CSBG Act. The CSBG Act uses 125% of the official poverty line, as defined by OMB, as a criterion for of eligibility.

Through a review of State CSBG policies, OCS reviewers determined that the policies and procedures for oversight and corrective actions are not in compliance with CSBG statute, Section 678C. OCS reviewers also determined that the State failed to provide an Annual Report in accordance with Section 678E

Program Operations

The State reported demographic information on individuals who received services using CSBG funds in FY 2007. CAAs and eligible entities operate numerous programs designed to meet the needs identified in their respective service areas. Due to different local needs, not all CAAs provide services in all priority areas. During this SA, agency records were reviewed to assess actual services provided. The assessment instrument addressed the following areas: client services received, expenditures, staff responsibility, board governance, by-laws, board meeting minutes, board manual, personnel, planning and operations, CSBG assurances, fiscal operations, T&TA grants, T&TA grant reviews, and agency postings (i.e., worker's compensation, client appeals, etc.)

The CAAs and eligible entities operate numerous programs designed to meet the needs identified in their respective service areas. Because the demographic data shows different local needs, not all eligible entities can provide extensive services in all priority areas. Supportive services and community outreach projects provided by the entities respond to low-income workers' health care.

The State and CAAs categorize their expenditures of CSBG funds according to the statutory list of program purposes. The categories are as follows:

- Securing and maintaining employment;
- Securing adequate education;
- Improving income management;
- Securing adequate housing;
- Providing emergency services;
- Improving nutrition;
- Creating linkages among anti-poverty initiatives;
- Achieving self-sufficiency; and
- Obtaining health care.

The State requires agencies receiving CSBG funds to prepare and submit an application referred to as a CAP to the State. The process requires CAAs to submit an application to the State for approval based on: 1) standard forms; 2) governing board approval; 3) information based on priority needs; and 4) information about how the entities will provide services in their communities.

The grant agreement outlines the following requirements for the State’s CAAs:

- A community needs assessment;
- A description of the service delivery system for low-income individuals and families in the service area;
- A description of linkages that will be developed to fill gaps in services through information, referral, case management, and follow-up consultations;
- A description of how funding will be coordinated with other public and private resources; and
- A description of outcome measures for providing services and promoting self-sufficiency and Nevada community revitalization. The CSBG Client Characteristics and Statistics reported by State are found in Table 2 indicated below.

Table 2

CSBG Client Characteristics and Statistics Reported by State	
Race/Ethnicity By Number of Persons:	
Hispanic or Latino	7,103
African American	2,656
White	13,320
Other	0
Multi-race	1,239
Education: Years of Schooling by Number of Persons:	
0-8 years	1,010
9-12, non graduates	1,978
High school graduate/GED	3,406
12+ some postsecondary	1,603
2 or 4 year college graduates	736
Insured/Disabled:	
No Health Insurance	10,799
Disabled	2,405
Surveyed About Insurance	20,527
Surveyed About Disability	20,527
Family Structure:	
Single Parent/Female	1,936
Single Parent/Male	245
Two Parent Household	2,068
Single Person	3,556
Two Adults, No Children	2,068
Family Housing by Number of Families:	
Own	1,699
Rent	5,307
Homeless	880
Level of Family Income as Percentage of Federal Poverty Guideline by Number of Families:	
Up to 50%	3,783
51% to 75%	1,401

76% to 100%	1,345
101% to 125%	834
126% to 150%	474
151% or more	785

The program activities associated with CSBG funds as used by the CAAs in Nevada for FY 2007 are detailed below:

Employment Programs

The State reported spending \$13,215 in CSBG funds to support a range of services designed to assist low-income individuals in obtaining and maintaining employment. These services may include:

- Support for TANF recipients who are preparing to transition to self-sufficiency or for former TANF recipients who need additional support to find or maintain employment;
- Support for job retention, including counseling, training, and supportive services, such as transportation, child care, and the purchase of uniforms or work clothing;
- Skills training, job application assistance, resume writing, and job placement;
- On-the-job training and opportunities for work;
- Job development, including finding employers willing to recruit through the agency, facilitating interviews, creating job banks, providing counseling to employees, and developing new employment opportunities in the community;
- Vocational training for high school students and the creation of internships and summer jobs; and
- Other specialized adult employment training.

Education Programs

The State reported spending \$259,188 in CSBG funds to provide education services. These services may include:

- Adult education, including courses in English Second Language (ESL) and General Equivalency Diploma (GED) preparation with flexible scheduling for working students;
- Supplemental support to improve the educational quality of Head Start programs;
- Child care classes, providing both child development instruction and support for working parents or for home child care providers;
- Alternative opportunities for school dropouts and those at risk of dropping out;
- Scholarships for college or technical school;
- Guidance regarding adult education opportunities in the community;
- Programs to enhance academic achievement of students in grades K–12, while combating drug or alcohol use and preventing violence; and
- Computer-based courses to help train participants for the modern day workforce.

Housing Programs

The State reported spending \$84,202 in CSBG funds to provide housing programs to improve the living environment of low-income individuals and families. These services may include:

- Homeownership counseling and loan assistance;
- Affordable housing development and construction;
- Counseling and advocacy about landlord/tenant relations and fair housing concerns;
- Assistance in locating affordable housing and applying for rent subsidies and other housing assistance;
- Transitional shelters and services for the homeless;
- Home repair and rehabilitation services;
- Support for management of group homes; and
- Rural housing and infrastructure development.

Emergency Services Programs

The State reported spending \$203,993 in CSBG funds for emergency services and crisis intervention. These services may include:

- Emergency temporary housing;
- Rental or mortgage assistance and intervention with landlords;
- Cash assistance/short-term loans;
- Energy crisis assistance and utility shut-off prevention;
- Emergency food, clothing, and furniture;
- Crisis intervention in response to child or spousal abuse;
- Emergency heating system repair;
- Crisis intervention telephone hotlines;
- Linkages with other services and organizations to assemble a combination of short-term resources and long-term support; and
- Natural disaster response and assistance.

Nutrition Programs

The State reported spending \$60,546 in CSBG funds to support nutrition programs. These services may include:

- Organizing and operating food banks;
- Supporting food banks of faith-based and civic organization partners with food supplies and/or management support;
- Counseling families on children's nutrition and food preparation;
- Distributing surplus USDA commodities and other food supplies;
- Administering the Women, Infants, and Children (WIC) nutrition program;
- Preparing and delivering meals, especially to the homebound elderly;
- Providing meals in group settings;
- Initiating self-help projects, such as community gardens, community canneries, and food buying groups;
- Information/referral/counseling;

- Hot meals, such as breakfasts, lunches, or dinners for congregate or home delivery meals; and
- Nutritional training in home economics, infant and child nutrition, diets, and available Federal or State programs.

Self-Sufficiency Programs

The State reported spending \$1,651,179 in CSBG funds on self-sufficiency programs to assist families in becoming more financially independent. These services may include:

- An assessment of the issues facing the family or family members, and the resources the family brings to address these issues;
- A written plan for becoming more financially independent and self-supporting; and
- Services that are selected to help the participant implement the plan (i.e. clothing, bus passes, emergency food assistance, career counseling, family guidance counseling, referrals to the Social Security Administration for disability benefits, assistance with locating possible jobs, assistance in finding long-term housing, etc.).

Health Programs

The State reported spending \$18,127 in CSBG funds on health initiatives which include addressing gaps in the care and coverage available in the community. The services may include:

- Recruitment of uninsured children to a State insurance group or State Children's Health Insurance Program (SCHIP);
- Recruitment of volunteer medical personnel to assist uninsured low-income families;
- Prenatal care, maternal health, and infant health screening;
- Assistance with pharmaceutical donation programs;
- Health-related information for all ages, including Medicare/Medicaid enrollment and claims filing;
- Immunization;
- Periodic screening for serious health problems, such as tuberculosis, breast cancer, HIV infection, and mental health disorders;
- Health screening of all children;
- Treatment for substance abuse;
- Other health services including dental care, health insurance advocacy, CPR training, education about wellness, obesity, and first-aid; and
- Transportation to health care facilities and medical appointments.

Income Management Programs

The State reported spending \$236,647 in CSBG funds on income management programs. These services may include:

- Development of household assets, including savings;
- Assistance with budgeting techniques;
- Consumer credit counseling;
- Business development support;
- Homeownership assistance;

- Energy conservation and energy consumer education programs, including weatherization;
- Tax counseling and tax preparation assistance; and
- Assistance for the elderly with claims for medical and other benefits.

Linkages

The State reported spending \$1,023,928 in CSBG funds on linkage initiatives. These services may include:

- Coordination among programs, facilities, and shared resources through information systems, communications systems, and shared procedures;
- Community needs assessments, followed by community planning, organization, and advocacy to meet these needs;
- Creation of coalitions for community changes, such as reducing crime or partnering businesses with low-income neighborhoods in order to plan long-term development;
- Efforts to establish links between resources, such as transportation and medical care or other needed services and programs that bring services to the participants, for example, mobile clinics or recreational programs, and management of continuum-of-care initiatives;
- The removal of the barriers such as transportation problems, that keep the low-income population from jobs or from vital everyday activities; and
- Support for other groups of low-income community residents who are working for the same goals as the CAAs.

At the local level, the CSBG program coordinates with labor programs, transportation programs, educational programs, elderly programs, energy programs, community organizations, private businesses, churches, the United Way, and various youth organizations and programs. The State's CAAs will coordinate with other service providers and act as a focal point for information on services in their local area. The CAAs identifies gaps in services and works with other providers to fill those gaps. The entities have organized meetings and participate in task forces with local service provider groups.

Programs for Youth and Seniors⁴

The State reported spending \$233,191 in CSBG funds on the programs serving youth and spending \$354,235 on programs serving seniors. Services noted under these categories were targeted exclusively to children and youth from ages 6 – 17 or persons over 55 years of age.

Youth programs, in many cases, may include:

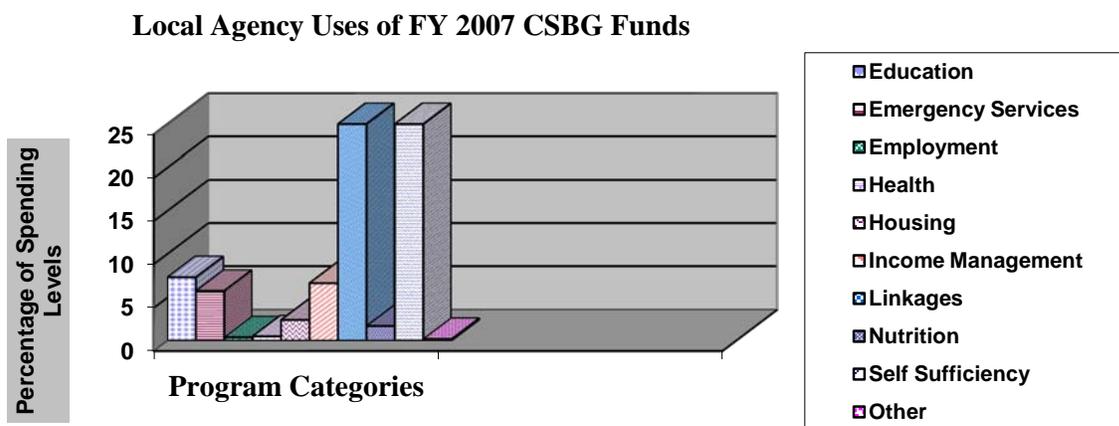
- Recreational facilities and programs;
- Educational services;
- Health services and prevention of risky behavior;
- Delinquency prevention; and
- Employment and mentoring projects.

⁴ Programs for Youth and Seniors are recorded separately in ROMA System, and therefore not listed on the local agency use of funds chart.

Seniors' programs help seniors to avoid or address illness, incapacity, absence of a caretaker or relative, prevent abuse and neglect, and promote wellness. These services may include:

- Home-based services, including household or personal care activities that improve or maintain well-being;
- Assistance in locating or obtaining alternative living arrangements;
- In-home emergency services or day care;
- Group meals and recreational activities;
- Special arrangements for transportation and coordination with other resources;
- Case management and family support coordination; and
- Home delivery of meals to insure adequate nutrition.

The chart below identifies the proportion of CSBG local expenditures devoted to most of the operational purposes noted previously.



ROMA System

Beginning in FY 2001, States were required to participate in a system to measure the extent to which programs are implemented in a manner that achieves positive results for the communities served. States may participate in the model evaluation system designed by the OCS in consultation with the CSBG network called the ROMA System. Alternatively, States may design their own similar system. States are to report to OCS their progress on the implementation of performance measurement practices.

In Information Memorandum Number 49, OCS encourages the States to submit complete, accurate, and timely annual reports to OCS on the “measured performance of the State and the eligible entity in the State.”

The Nevada CSBG Manual outlines the accountability and reporting requirements for its eligible entities. According to the State policies all eligible entities are required to participate in the performance measurement system which satisfies CSBG statutes. ROMA data is collected through the Case Management Software system that was used by only one eligible entity visited. ROMA training is provided through the NASCSP conferences on the State level, and through the local CAP conferences held for Nevada eligible entities.

Through interviews with State staff responsible for the administration of the CSBG program and a review of ROMA data collection, OCS reviewers determined that the State did not employ a uniformed information and data collection system for all State agencies.

III. CAA Onsite Review Summaries

Churchill County Department of Social Services

Churchill County Department of Social Services (CCSS) is a public organization established in 1971. The organization goal is to facilitate the self-sufficiency of program recipients. These programs provide for the health and welfare of county residents who are eligible residents and indigents to receive emergency temporary assistance. In 2007, CCSS had an annual CSBG budget of \$100,515 and provided assistance to nearly 1,556 clients. CCSS uses CSBG funds to address each situation on a personal level and on as need basis. Through development of formal regional and statewide groups such as, Rural Nevada Continuum of Care and Nevada Association of Community Action Agencies, CCSS started to assist the Social Services Agency to develop in a more modeled approach to address community needs that resulted in assisting with poverty on a larger level.

Lyon County Human Services

Lyon County Human Services (LCHS) is a County department established by the Board of Lyon County Commissioners in accordance with Nevada Revised Statutes (NRS). The Department is the outcome of a successful effort to increase access to social services and senior services in Lyon County. In 1994 the Lyon County Board of Commissioners authorized and directed the consolidation of county-wide social services and the three senior centers in Dayton, Fernley, and Silver Springs. In 2007, LCHS had an annual CSBG budget of \$73,149 and provided assistance to nearly 2,147 clients. LCHS is also partnering with local businesses and western Nevada Community College (WNCC) to implement the Employee Preparedness Academy. This is a new initiative that will work with local employers to provide training to applicants and new employees.

Community Services Agency and Development

The Community Services Agency Development Corporation (CSA) has been in operation since 1965. CSA is a private nonprofit social services agency with an associated non-profit development entity. CSA began its affordable housing development 17 years ago and subsequently Community Services Development Corporation was developed. CSA's largest Social Service Program is its Head Start program, serving more than 560 children and their families annually. Through CSBG, CSA provides education, income management, housing, linkages, programs for youth and self sufficiency programs. In FY 2007 CSA provided services to 2,194 individuals and families through CSBG funded programs.

IV. Assessment Findings and Recommendations

Through a review of the State of Nevada’s policies, procedures, and documentation, OCS reviewers determined that the State was not in full compliance with CSBG statutes, the Terms and Conditions of the grant, and other Federal regulations and guidance.

According to §92.43(a) Remedies for Noncompliance. If a grantee or subgrantee materially fails to comply with any term of an award, whether stated in a Federal statute or regulation, an assurance, in a State plan or application, a notice of award, or elsewhere, the awarding agency may temporarily withhold cash payments pending correction of the deficiency by the grantee or subgrantee or more severe enforcement action by the awarding agency.

Finding 1

The State failed to monitor eligible entities in accordance to Section. 678(B) of the CSBG statutes.

Recommendation:

OCS recommends the State:

1.1 Develop and implement a monitoring plan that would assure each eligible entity is monitored at least once every three years, and newly formed entities are monitored, as required by law.

Finding 2

The State failed to comply with Section. 676G(b)of the CSBG statutes that requires eligible entities make referrals to the Office of Child Support Enforcement (OCSE).

Recommendation:

OCS recommends the State:

2.1 Implement policies that would assure eligible entities make appropriate referrals to OCSE as required by law.

Finding 3

The State did not have policies and procedures in place that would assure compliance with CSBG statute, Section 673(2) Income Eligibility requirements.

Recommendation:

OCS recommends the State:

3.1 Develop and implement policies that would ensure income guidelines are in compliance with CSBG statutes.

Finding 4

The State did not have a process through which the State ensured that each eligible entity has a functioning Tripartite Board, as required by Section. 676B of the CSBG Statutes.

Recommendation:

OCS recommends the State:

4.1 Revise and/or develop policies and procedures to assure that each eligible entity has a functioning Tripartite Board as required by law.

Finding 5

OCS reviewers determined that the policies and procedures for oversight and corrective actions are not in compliance with CSBG statute, Section. 678C.

Recommendation:

OCS recommends the State:

5.1 Develop and implement policies and procedures that would assure oversight and corrective actions to be in compliance with Federal regulations, guidance, and requirements.

OTHER MATTERS

ROMA DATA

OCS reviewers noted that the State did not use a uniformed data collection system for collecting and recording ROMA data. At least one eligible entity visited collected ROMA data manually. Only one eligible entity visited used a case management software system to collect and record client data.

OCS reviewers determined the State data collection process may be subject to irregularities, inadequate data, and human errors. OCS reviewers recommend the State review and revise the data collection process to produce more reliable data submitted into the Information Survey (IS) reports.

The State should comment on this report within 30 days. If no comments are provided on the text and substance of the report within 30 days, the report will be considered final. If you have any questions or comments, please contact:

Frances Harley
Financial Operations Team Leader
Telephone: (202) 401-6888
Fax: (202) 401-5718
E-mail: frances.harley@acf.hhs.gov

Correspondence may be sent to:
Frances Harley
Financial Operations Team Leader
Administration for Children and Families
Office of Community Services
Division of State Assistance
370 L'Enfant Promenade, S.W., 5th Floor West
Washington D.C. 20447