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

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## **Community Services Block Grant Program**

*Utah State Assessment*

*On-Site Review*

May 12-16, 2008

# Utah State Assessment

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# Utah Community Services Block Grant

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## Executive Summary

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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 Utah CSBG program provides funding, technical assistance and support to nine multipurpose Statewide eligible entities or CAAs<sup>1</sup> serving 29 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 from a State Assessment (SA) of the Utah Community Services Block Grant program and its eligible entities as evaluated by Federal staff of the Division of State Assistance, 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

State Assessments (SAs) are conducted to examine the implementation, performance, compliance, and outcomes 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 2008-2010. Federal staff conducted an on-site review of the Utah CSBG program and its eligible entities from May 12-16, 2008. The evaluation included interviews and data collection. As per the statute, the SA examines the State and its CAAs' 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, and migrant and seasonal workers, and youth;
2. Coordination of service delivery to ensure linkages among services, including as it relates to employment and training activities, the Low Income Home Energy Assistance Program (LIHEAP), and 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;

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<sup>1</sup> The terms eligible entities and CAAs are used interchangeably.

5. Adherence to statutory procedures governing the termination and reduction of funding for local entities administering the program;
6. Adequate and appropriate composition of Tripartite Boards and rules of CAAs;
7. Appropriate fiscal and programmatic procedures to include a Community Action Plan from each CAA 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.<sup>2</sup>

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

1. Distribution methodology for disbursement of CSBG funds to sub-State 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 consists of two levels of evaluation by Federal staff:

1. Federal staff examined the State-level assurances and fiscal and administrative governance issues regarding the CSBG program in interviews and data collection with State officials.
2. Federal staff also conducted desk assessments of the State's monitoring of local Community Action Agencies to determine compliance with assurances and governance requirements by gathering information from local agencies engaging in additional interviews and data collection.

State-level interviews included the following Utah Department of Community and Culture (UDCC), Division of Housing and Community Development officials: Jonathan Hardy, Director, State Community Service Office (SCSO); Bonnie Burley, Human Resources; Gordon Walker, Director, Housing and Community Development; David Fleischer, Accountant/Financial Manager SCSO; Douglas Lee, Auditor, SCSO; Stephanie Bourdaux, Program Specialist, SCSO; Dale Canning, Deputy Director, Salt Lake Community Action Program (CAP); Donald Carpenter, Executive Director Ogden Weler Community Action Program (OWCAP); Jackie Scott Wallwork, Bookkeeper, OWCAP; Heather Tritten, Executive Director, Utah Community Action Partnership Association; Myla Dutton, Executive Director, Utah Community Action Services; Man Diep, Auditor, Internal Audit Department; and Kim Hale, Finance Director, UDCC.

Local eligible entities interviewed included: Community Action Services of Provo, Utah; Salt Lake CAP, Salt Lake City, Utah; and Utah Community Action Partnership Association, Ogden, Utah.

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<sup>2</sup> Some assurances have been combined where appropriate.

Office of Community Services reviewers included: Frances Harley, Auditor, Financial Operations Team Leader; Isaac Davis, Program Specialist; James Henry, Program Specialist; and Michael Pope, Auditor; and Emmanuel Djokou, Auditor.

## **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 program, including:

- Administrative, program and financial operations for the State and each CAA visited;
- Brochures and literature on services provided;
- The most recent CSBG Financial Summary Report;
- SF 269 report for Fiscal Year (FY) 2006 showing total funds authorized;<sup>3</sup>
- Audited Financial Statements; and
- The Utah State CSBG Plan.

## **Fiscal and Governance Operations**

The CSBG statute requires that each State designate a lead agency to administer the CSBG program, and provide oversight of agencies that administer programs in the communities, or Community Action Agencies. The lead agency designated to administer the CSBG program is the Utah Department of Community and Culture (UDCC). Nine CAAs are designated to receive CSBG funds in Utah, who then are responsible for the local level delivery of CSBG program activities and services. Of the block grant distributions made to eligible entities in FY 2006, Utah allocated 90 percent of Community Services Block Grant funds to local eligible entities. Utah used five percent of the CSBG funding for their administrative expenditures in FY 2006, and five percent for training and technical assistance to agencies in need of such, and funding to non-eligible entities addressing non-traditional community needs. Table 1 illustrates how the funds allocated to Utah were utilized.

The Eligible Family Literacy Services, Poverty Line states, "Whenever the State determines that it serves the objectives of the block grant program established under this subtitle, the state may revise the poverty line not to exceed 125% of the official poverty line otherwise applicable under this paragraph."

OCS reviewers found that the State served individuals at 125% of poverty. OCS reviewers requested all supporting documentation. The State provided adequate documentation during this review.

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<sup>3</sup> The SF 269—Long Form is used to report the amount of program income earned and the amount expended.

**Table 1**

<b>Use of FY 2006 Funds: Utah</b>		
<b>Uses of Funds</b>	<b>Amount Expended</b>	<b>Percentage of Expenditures</b>
Grants to Local Eligible Entities	\$2,923,249	90%
Administrative and Monitoring Costs	\$162,402	5%
Discretionary Projects	\$162,402	5%
<b>Total Used in FY 2006</b>	<b>\$3,248,053</b>	<b>100%</b>

Administrative expenditures of the grant were used for the management and monitoring oversight of the program. Priority areas for discretionary spending were identified by local faith and community-based organizations, in collaboration with the State. Discretionary funding was needed for critical activities to address improvements to agency systems, program development, personnel management, fiscal operations, board training, and strategic planning. As noted, the State served individuals at 125% of poverty. There were no irregularities in fiscal governance found by the Federal reviewers.

**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 to ensure that all CAAs have systems 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 application becomes a grant agreement between the State and the CAAs and includes assurances, goals, plans, agency budgets, and procedures for developing and implementing services. The process requires CAAs to submit an application to Utah for approval, based on: 1) standard forms; 2) governing board approval; and 3) information about how entities will provide services in their communities. States are required by statute to perform monitoring duties in a full on-site review at least once every three years for each CAA.

The State performs on-site reviews of both programmatic and fiscal compliance in accordance with the statutory requirement of once every three years. The State also reviews the programmatic outcomes of each of their grantees on a yearly basis and participate in their yearly planning processes. 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 were coordinated with the CAAs if deficiencies and/or problems were noted during the on-site visit. A final report is sent to the Board Chairperson and the Executive Director of the agency.

## Financial Monitoring and Accountability

The State is required to perform full on-site monitoring reviews at least once every three years for each CAA. The State conducts on-site fiscal monitoring for its nine eligible entities on an annual basis. Not all site visits require a focus on the entire CSBG program but may focus on specific areas during the State's assessment the review of the agency's administration of other Federal grant programs such as Low Income Home Energy Assistance Program (LIHEAP); Results Oriented Management and Accountability (ROMA); board issues; or training and technical assistance. The State's three-year monitoring schedule is listed below in Table 2.

**Table 2**

Utah Department of Community and Culture CSBG/CAA Monitoring Schedule		
Agency Name	On-site Monitoring Visit	Counties Served
Bear River Association of Governments	September 2005	Box Elder, Cache, Rich
Community Action Services of Provo	September 2006	Wasatch, Utah, Summit
Family Connection Center	September 2007	Davis, Morgan
Five County Association of Governments	May 2006	Garfield, Iron, Beaver, Washington, Kane
Ogden-Weber Community Action Partnership	November 2007	Weber
Salt Lake Community Action Program	November 2005	Tooele, Salt Lake
Six County Association of Governments	July 2005	Millard, Juab, Sanpete, Sevier, Piute, Wayne
Southeastern Utah Association of Local Governments	September 2005	Emery, Carbon, Grand, San Juan
Uintah Basin Association of Governments	June 2007	Uintah, Duchesne, Daggett

OCS reviewed financial reports for information on allowable cost and activities associated with annual financial training and technical assistance. Annual financial training includes training on the completion of financial forms, OMB Circulars, and other related topics.

The State's CSBG program year is from October 1 through September 30. Utah's eligible entities' grant agreements for CSBG last 18 months for each Program Year. Any costs incurred by entities prior to that first quarter are reimbursable subject to the State's receipt of Federal fiscal year funds. Contracts are prepared on the basis of receiving the same amount of federal funds as the prior Federal fiscal year and funds are released as they become available from OCS.

OCS reviewed data from the Financial Accounting System for the State of Utah (FINET), the primary financial information system for the State. FINET facilitates State budget planning and

long-range financial programming. OCS reviewers were provided access to the website to verify the system's operation and financial reporting capabilities.

In order to verify that fiscal controls and adequate accounting practices were in place, OCS reviewers examined various transactions and monthly financial reports. The State operates on a reimbursement system, and monthly reports are the primary tools for evaluating allowable expenditures and tracking budget line items. Monthly reports are reviewed by State fiscal staff and subsequently reviewed by the Fiscal Manager before payments are processed. CAAs are encouraged to use an electronic transfer system for fund reimbursements. OCS reviewers examined the monthly reports approval process and a sampling of the subsequent CSBG disbursement to entities.

Administrative costs include salaries and benefits of 5 State employees paid through CSBG. Hours charged to the CSBG program varies weekly based upon the amount of time spent working on CSBG-related projects. OCS reviewers examined a sampling of the hours charged for CSBG-related projects and how the recorded time is processed through payroll. Utah does not issue nor use credit cards for employee expenditures. The State uses direct billing for all employee-related expenses, including travel. OCS reviewers examined the procurement policies and procedure manuals used by UDCC. The OCS reviewers had no findings in these areas related to the expenditures charged to CSBG related projects.

OCS reviewers examined the UDCC internal audit process. Audits are performed by the Operations Division, Audit Office staff. State auditors examined all UDCC funding made to eligible entities dating back to the previous UDCC audit. Audit findings were reported to CAA Executive Directors and Boards of Directors. The State's audit findings were reviewed for appropriate support documents for completion and closure. The CAA Boards of Directors are required to respond to the notification letter within 30 days with a written Corrective Action Plan (CAP) which address findings. In accordance with internal auditing policies and procedures, the State's audit staff must review and approve the CAP. The CAA's failure to respond within the allotted timeframe may result in disciplinary actions being taken by UDCC, up to and including funds de-obligation. The lead auditor is the State official responsible for audit follow-up activities, including resolution and corrective action monitoring. Technical assistance is available through UDCC on a case-by-case basis for those CAAs with audit findings. The OCS reviewers found the State to be in compliance and had no findings for technical assistance.

### **OMB Circular A-133, Single Audit Act of 1997**

According to 45 CFR §96.31, grantees and subgrantees 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 with reportable findings. The State CSBG Plan submitted to OCS states 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 UDCC 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. UDCC also considers the government auditing standards promulgated by the Comptroller General, U.S. Government Accountability Office, in the performance of their duties.

The Office of the State Auditor has completed their most current audit of selected accounts included on the financial statements of the UDCC for the year ended December 31, 2005. The State Auditor concluded that no matters involving State internal control over financial reporting and its operations were considered to be material. The results of their tests disclosed no instances of noncompliance or other matters required to be reported under *Government Auditing Standards*. A copy of the audit report was provided to OCS reviewers.

OCS reviewers also examined the Data Collection Form for reporting on Audits of States, Local Governments, and Non-Profit Organizations found on the Federal Audit Clearinghouse website. The OCS reviewers found the State forms complete and in accordance with the Federal requirements. The OCS reviewers verified that there were no areas of noncompliance, reportable conditions, including material weaknesses, questioned costs, fraud, or other reportable items for CSBG. OCS reviewers concluded that the audit procedures currently being used by Utah and its CAAs are in accordance with generally accepted auditing principles.

### **Recapture and Redistribution**

The State certified in their State CSBG plan that it adheres to Section 678C of the CSBG Act. The State assures OCS that it will not terminate present or future funding of any eligible entity or de-designate a CAA or other eligible entity until Section 678C of the CSBG Act procedures are followed and reviewed by the Secretary of the U.S. Department of Health and Human Services. The State also assured OCS that it would not reduce an eligible entity of CAA funding below the proportional share of funding it received in the previous fiscal year, except in accordance with the requirements of the CSBG Act.

OCS reviewers concluded that the State's process related to the recapture and redistribution assurances are acceptable, and there were no instances of noncompliance identified during the review.

### **Carryover Balance**

The State's CSBG "Carryover Balance" requirements are explained in the Utah Administrative Code on policies and procedures. CSBG carryover funds for the past two years indicate that \$537,297 and \$676,870 was carried over from fiscal year 2005 and fiscal year 2006, respectively.

OCS reviewers suggested alternative approaches in strengthening the State's internal control procedures to ensure CSBG funds are properly accounted.

### **Public Hearings**

According to Section 676(a)(2)(B), of the CSBG Act, 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 will hold at least one public hearing. For FY 2005-2006 CSBG State Plan, a seven-day public review and comment was established from August 8-14, 2004. OCS reviewers suggested that the public notice should be published prior to the start of the public comment period; which allows the public maximum opportunity to comment on the State Plan. On January 23, 2006, the State sponsored the 2006 Legislative Hearing at the State Capitol Complex, Room W140, West Office Building, Salt Lake City, Utah.

## **Tripartite Boards**

The State requires the nine 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, 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.

Each CAA 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, dates(s) of the training, and meeting attendees. Additionally, certification must include an annual audit of services and expenditures and reporting requirements for State, Federal, and other funding sources. These requirements are included in the contract signed between the CAA and the State, the CSBG manual, the State Plan, and in the CSBG statute. The State-outlined responsibilities of the Tripartite Board include:

- Ensuring that all administrative requirements are met;
- Establishing policies, rules, regulations and bylaws consistent with the agency's mission;
- Establishing accounting systems and fiscal controls consistent with general 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 identified by audits.

In accordance with Federal and Utah State law, each CSBG grantee, in order to be in full compliance, is required to adhere to the composition, documentation, bylaws, board manual and board meeting minutes as detailed in the CSBG Act of 1998, Section 676B. The State CSBG office monitors board composition and follows up with the agency when the representation needs to be adjusted. OCS reviewers found the State to be in compliance with this standard. The State was extremely responsive in providing the documentation requested throughout the process.

UDCC assures that each eligible entity is in compliance with the Federal law regarding Tripartite Boards by providing information regarding the requirements of a Tripartite Board to each eligible entity in three documents: CSBG Operations Manual, the CSBG Grant Agreement, and the CSBG assurances submitted with the State Plan each year.

## **Additional Administrative or Fiscal Operations Findings**

Fiscal controls for eligible entities are mandated by UDCC's policies and procedures. All eligible entities are required to maintain an updated financial procedures manual that establishes procedures to meet fiscal standards set forth by State policies. Additionally, financial policies and procedures for eligible entities must be approved by their Boards of Directors and reviewed by State. The State requires a series of financial reports from all eligible entities. 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 fiscal year. The annual on-site compliance reviews conducted by the State also determine compliance to specific areas including financial compliances. Failure to comply with State reporting requirements may result in corrective action including suspension of grant awards.

An in-depth analysis of the information received during interviews and documentation received during the assessment of the Utah CSBG program indicates that the State has in place adequate program and financial systems to oversee CSBG funds. OCS reviewers were able to review following: 1) all requested documents; 2) statistical sampling of the State's General Ledger to determine if expenditures were allowable, allocable and supported by documentation; and 3) the State's accounting system that was capable of generating accounting reports when requested. OCS reviewers determined that the State's records management processes were in compliance.

The 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 in compliance with the CSBG statute.

## **Program Operations**

The State reported demographic information on individuals who received services using CSBG funds in FY 2006. The CAAs 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 State Assessment, agency records were reviewed to assess actual services provided. The assessment instrument addresses 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, T&TA grants, T&TA grant review, and agency postings (i.e., worker's compensation, client appeals).

States 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.

Table 3 shows the reported characteristics of individuals and families served throughout the State.

**Table 3**

<b>CSBG Client Characteristics and Statistics Reported by State</b>	
<b>Race/Ethnicity By Number of Persons:</b>	
Hispanic or Latino	24,655
African American	2,314
White	92,072
Other	10,511
Multi-race	580
<b>Education: Years of Schooling by Number of Persons:</b>	
0-8 years	1,508
9-12, non graduates	20,475
High school graduate/GED	10,380
12+ some postsecondary	3,313
2 or 4 year college graduates	1,715
<b>Insured/Disabled:</b>	
No Health Insurance	39,039
Disabled	6,429
Surveyed About Insurance	58,601
Surveyed About Disability	41,503
<b>Households Headed By Single Parent:</b>	
Female	10,478
Male	1,936
Two Parent Household	10,000
Single Person	11,247
Two Adults, No Children	2,999
<b>Family Housing by Number of Families:</b>	
Own	4,962
Rent	29,705
Homeless	3,381
<b>Level of Family Income as Percentage of Federal Poverty Guideline by Number of Families:</b>	
Up to 50%	20,341
51% to 75%	7,374
76% to 100%	4,932
101% to 125%	2,722
126% to 150%	1,362
151% or more	1,702

The State requires agencies receiving CSBG funds to prepare and submit a “Community Action Plan” to the State. The application becomes the grant agreement between UDCC and the CAA, and includes assurances, goals, plans, agency budgets, and procedures for developing and implementing services.

The process requires CAAs to submit an application to Utah for approval based on: 1) standard forms; 2) governing board approval; 3) information based on priority needs; and 4) information about how entities will provide services in their communities. Based on the Results Oriented Management and Accountability process, the grant agreement outlines the following requirements for State 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 service 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 Utah community revitalization.

Detailed below are the program activities associated with CSBG funds as used by CAAs in the State for FY 2006.

### **Employment Programs**

The State reported spending \$137,578 in CSBG funds to support a range of services designed to assist low-income individuals in obtaining and maintaining employment. These services 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 and 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 \$118,474 in CSBG funds to provide education services, such as:

- 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 about 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 \$302,093 for CSBG-coordinated housing programs to improve living environment of low-income individuals and families. CSBG-funded activities 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 \$639,870 for emergency services to combat many kinds of crisis. Crisis management services include:

- Emergency temporary housing;
- Rental or mortgage assistance, 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 longer-term support; and/or
- Natural disaster response and assistance.

### **Nutrition Programs**

The State reported spending \$835,742 in CSBG funds to support nutrition programs. Specific nutritional services provided by the State's CAAs are:

- Organizing and operating food banks;
- Supporting food banks of faith-based and civic organization partners with food supplies and/or management support;
- Counseling regarding family and 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; and/or
- 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;
- Neighborhood and community gardens, community canneries and projects to help families and individuals preserve fruit and vegetables; and
- Nutritional training in home economics, child and baby nutrition, diets, and available federal or State programs.

### **Self-Sufficiency Programs**

The State reported spending \$167,810 on self-sufficiency programs. Self-sufficiency programs offer a continuum of services to assist families in becoming more financially independent. Such programs generally 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 \$17,890 on CSBG-funded health initiatives. CSBG funds may be used to address gaps in the care and coverage available in the community. Eligible entities may use CSBG funds for health initiatives that 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, and HIV infection, and for mental health disorders;
- Health screening of all children;
- Treatment for substance abuse;
- Other health services including dental care, health insurance advocacy, CPR training, and education about wellness, obesity, and first-aid; and/or
- Transportation to health care facilities and medical appointments.

## **Income Management Programs**

The State reported spending \$70,519 on income management programs using CSBG grant funds. Services supported 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 \$626,723 on linkage initiatives. Linkage programs can involve any or all of a variety of local activities which CSBG supports because of the block grant's statutory mandate to mobilize and coordinate community responses to poverty. These 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 into partnership 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, programs that bring services to the participants, such as mobile clinics or recreational programs, and management of continuum-of-care initiatives;
- The removal of the barriers such as transportation problems, that keep the poor from jobs or from vital everyday activities; and
- Finally, support for other groups of low-income community residents who are working for the same goals as the CAA.

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 eligible entities coordinate with other service providers and act as a focal point for information on services in their local area. They identify gaps in services and work with other providers to fill those gaps. Entities have organized meetings and participated in task forces with local service provider groups.

Linkage programs and activities include elderly projects, area wide multiple transportation projects for clients and families, the food banks, youth summits, fatherhood initiatives, urban sports initiative, and others that involve community wide participation. The various local needs assessments conducted by eligible entities involve local service providers and citizens of the

community in determining primary community needs and developing priorities for providing the appropriate programs and services to meet the needs.

**Programs for Youth and Seniors**

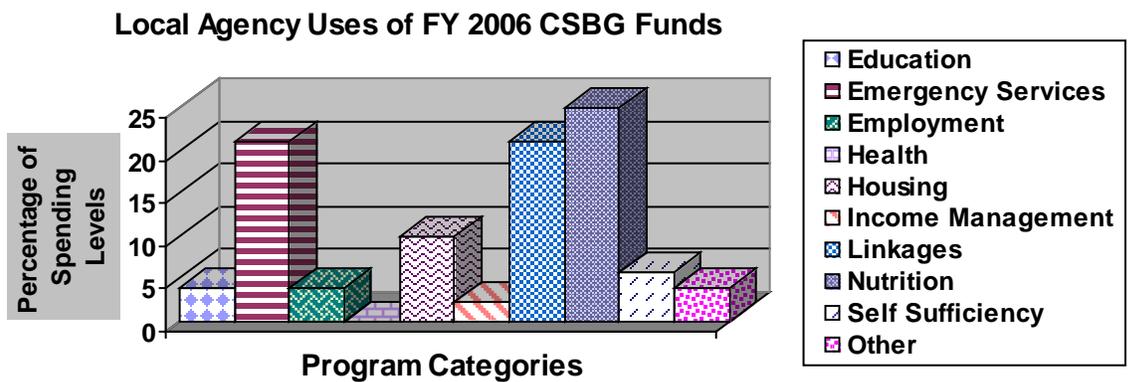
The State reported spending \$96,624 on programs serving seniors, and \$659,769 on programs serving youth. Services noted under these categories were targeted exclusively to children and youth from ages 6–17 or persons over 55 years of age. Seniors’ programs help seniors to avoid or address illness, incapacity, absence of a caretaker or relative, prevent abuse and neglect, and promote wellness. They 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.

Youth programs, in many cases, include such services as:

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

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



**Results Oriented Management and Accountability (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 Office of

Community Services in consultation with the CSBG network called the Results Oriented Management and Accountability System, or ROMA. Alternatively, States may design their own similar system. States are to report to OCS their progress on the implementation of performance measurement practices.

Based on interviews and analyses of the ROMA reports, OCS reviewers identified some discrepancies in the ROMA data. The OCS reviewers recommend that the State provide instructions and/or a training module to address case management and data discrepancies.

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 entities in the State.”

## **CAA On-Site Review Summaries**

### **Community Action Services, Inc. (CAS)**

Community Action Services, Inc. is a private non-profit organization incorporated in 1967 to administer programs that address housing, health, employment, self-sufficiency, counseling, tax preparation, emergency home heating and cooling assistance, and special services responding to crisis requests for financial assistance to acquire safe, affordable housing and pay emergency costs. CAS is the home of Utah’s second largest food bank. In 2006, CAS provided emergency food services to 19,426 households. In addition to the households served, CAS also provided food for food pantries located outside of the Mountain Land Region when supply was available. CAS helps residents prepare for employment through activities such as job-readiness training, customer service training, computer studies, and job search assistance and placement. CAS is located in Provo, Utah. The agency had an annual budget of \$627,412 in CSBG funds. The agency serves Wasatch, Utah, Summit counties.

### **Salt Lake Community Action Program (SLCAP)**

SLCAP is a private non-profit corporation chartered in 1965 for the purpose of providing work and education assistance to the impoverished of Salt Lake and Tooele Counties. SLCAP is also a 501(c) (3) tax exempt organization. SLCAP is located in downtown Salt Lake City. The agency had an annual budget of \$995,685 in CSBG funds.

SLCAP served over 96,066 individuals from 20,119 households in 2006. SLCAP reported 62% of the households were families with children and 65% of the total individuals served are children under age 18. In families with children, 43% were two-parent households, while 80% of the single-parent households were headed by women. SLCAP provides a variety of services including preschool child care, senior companion program, a transitional and homeless shelter, a home buyer's program, a youth adolescent offenders program, a mentoring and male participant program, utility/rental assistance.

## Assessment Summary and Recommendations

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### **Finding 1 – The State did not have policies or procedures in place for verifying the ROMA data entered by the CAA’s Case Management staff.**

Based on interviews and analyses of the ROMA reports, OCS reviewers identified discrepancies in the ROMA data.

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 entities in the State.”

### **Recommendation**

We recommend the State:

- 1.1 Implement policies and procedures for verifying the accuracy of the ROMA data.
- 1.2 Provide further assistance to the CAAs specific to case management and data discrepancies.

**STATE’S COMMENTS:** The State concur with the finding. Below are the State’s action steps:

1. The State will implement a new monitoring component as part of its review process to verify the accuracy of data provided in ROMA reports
2. The State will use its subcontract with the Utah Community Action Partnership Association to offer up front technical assistance and training to new case management personnel to ensure data accuracy. Currently, two individuals have attended training to become ROMA certified trainers. These two will be utilized within our subcontract to further the effort with other CAAs.
3. UCAPA and its partner CAAs will implement a new database system to better track ROMA data and to improve input from all CAAs and subcontractors.

The State should comment on this report and submit a plan of action addressing OCS recommendations 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. However, to sustain compliance with CSBG program requirements, the State must provide responses to the recommended actions within the required timeframe. If you have any questions or comments, contact:

Frances Harley  
Financial Operations Team Leader  
Telephone: (202) 401-6888  
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E-mail: [frances.harley@acf.hhs.gov](mailto: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., 5<sup>th</sup> Floor West  
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State of Utah

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GARY R. HERBERT  
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Executive Director

Division of Housing and Community Development

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Division Director

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September 11, 2008

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Administration for Children and Families  
Office of Community Services  
Division of State Assistance  
370 L'Enfant Promenade, S.W., 5<sup>th</sup> Floor West  
Washington D.C. 20447

Re: Response to Draft State Assessment

Dear Ms. Harley:

This letter is in response to the draft report of findings and recommendations listed in the State Assessment performed on May 12-16, 2008 for the State of Utah. We appreciate the opportunity to have received your visit and recommendations for improving our administration of the Community Services Block Grant (CSBG) in the State of Utah.

We offer the following clarifications and response associated with the report and its related finding and recommendations:

**Draft Statement**

Page 4 of the draft reports states, "The State recently changed its monitoring schedule from once every three years to annually."

**Clarification**

The State performs on-site reviews in accordance with the statutory requirement of once every three years. Although we do review the programmatic outcomes of each of our grantees on a yearly basis and participate in their yearly planning processes, the actual on-site review of both programmatic and fiscal compliance occurs once every three years.

**Draft Statement**

Page 5 of the draft report states, "The State's program year is from January 1 through December 31. The last quarter, October 1 through December 31, is the first quarter of the new Federal fiscal year. Utah's eligible entities' grant agreements cover nine months and are then later amended to cover the entire 12 months once the State receives its first quarter Federal CSBG grant award."

**Clarification**

The State operates CSBG on the program year October 1- September 30. Utah's grant agreements for CSBG last 18 months for each Program Year. This is due to the nature of the funds being released typically one month later into the fiscal year as a result of the cycle rate at which Congress has approved budgets for the CSBG Program. Contracts are prepared on the basis of receiving the same amount of federal funds as the prior federal fiscal year and funds are released as they become available from OCS. Should the total allocation be adjusted up or down, we would then process an amendment to adjust the total allocation, but not the contract period. Page 5 of the draft report refers to grant agreements covering nine months, but then amended to twelve months.

**Draft Finding & Recommendations**

*"The State did not have policies or procedures in place for verifying the ROMA data entered by the CAA's Case Management Staff"*

*We recommend the State:*

- 1.1 Implement policies and procedures for verifying the accuracy of the ROMA data.*
- 1.2 Provide further assistance to the CAA's specific to case management and data discrepancies.*

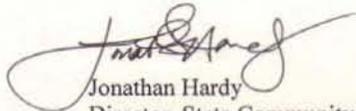
**Response**

We concur with the finding. We offer the following action steps to remedy the situation:

1. The State will implement a new monitoring component as part of its review process to verify the accuracy of data provided in ROMA reports
2. The State will use its subcontract with the Utah Community Action Partnership Association to offer up front technical assistance and training to new case management personnel to ensure data accuracy. Currently, two individuals have attended training to become ROMA certified trainers. These two will be utilized within our subcontract to further the effort with other CAAs.
3. UCAPA and its partner CAAs will implement a new database system to better track ROMA data and to improve input from all CAAs and subcontractors.

Again, we appreciate your visit and look forward to improving our administration of CSBG through your recommendations and our corresponding action steps. Should you have questions about any of the above responses and clarifications, please feel free to contact me at (801) 538-8650 or via email [jhardy@utah.gov](mailto:jhardy@utah.gov).

Sincerely,



Jonathan Hardy  
Director, State Community Services Office