

## I. The Narrative State Plan

### A. Administrative Structure

#### 1) State Administrative Agency

- a) The state Administrative Agency of the Community Services Block Grant (CSBG) American Recovery and Reinvestment Act of 2009 (Recovery Act) Program is the Alabama Department of Economic and Community Affairs (ADECA). The mission of ADECA is to access, secure and utilize all available human, physical and financial resources for the purpose of ameliorating the causes of poverty, and to equip low-income people in Alabama with the resources needed to overcome barriers to self-sufficiency by providing them with the tools to address their most pressing needs while improving their quality of life.

ADECA is the State agency designated by the Governor to apply for, receive and expend funds to administer the CSBG Recovery Act in Alabama and to assure sub-grantee certification.

The Director's Office Community Services Division manages the CSBG program, which primarily promotes community, and social development through grants and technical assistance to improve the social condition of citizens throughout Alabama.

#### b) Goals and Objectives

**Goal 1-** Administer programs in accordance with the CSBG Act and Recovery Act statutory purposes and goals and in compliance with all other applicable State and Federal statutes, rules, regulations, policies and procedures.

**Objective 1-** Distribute funds in accordance with all applicable Federal and State statutes.

**Objective 2-** Monitor Recovery Act funds to ensure compliance with the purposes of the Recovery Act legislation, utilizing existing programmatic monitoring practices and new desk top monitoring software.

**Goal 2-** Develop cooperative alliances throughout the State; including federal, state, local and nonprofit agencies that share the vision of mitigating and eradicating poverty.

**Objective 1-** Develop agency profiles to determine agency strengths, weaknesses, service gaps, existing partnerships, and potential partnerships.

**Objective 2-** Build and maintain a network of community service oriented organizations.

**Goal 3-** Ensure that all entities eligibility documents are current and in compliance with all State and Federal statutes, rules, regulations, policies and procedures.

**Objective 1-** Improve the quality and effectiveness of monthly desk reviews.

**Objective 2-** Monitor and maintain eligibility files.

**Objective 3-** Provide technical assistance regarding Articles of Incorporation, By-laws, board structure, etc.

**Goal 4-** Ensure that all programmatic and fiscal operations are in compliance with all applicable State and Federal statutes, rules, regulations, policies and procedures.

**Objective 1-** Complete on site monitoring at a minimum of once per fiscal year.

**Objective 2-** Attend a minimum of two board meetings per eligible entity per fiscal year (2 per agency).

**Objective 3-** Provide access to a web-based reporting and monitoring system, at no cost to eligible agencies.

**Objective 4-** Review all monthly reimbursements for fiscal and programmatic accountability.

## **2) Eligible Entities**

- a) See attached list in Appendix ?
- b) See attached map in Appendix ?

## **3) Distribution and Allocation of funds**

Planned Distribution-The State of Alabama has been allocated \$18,335,446 through the CSBG Recovery Act. As required by the Recovery Act, 1% (\$183,354) of the funding will be used for benefit enrollment coordination activities. The remaining 99% (\$18,152,092) will be distributed to the eligible entities according to the formula set forth in the Alabama Code §11-96-2  
See Appendix ?

Proposed Allocation of CSBG Recovery Act Funds to Eligible Entities: See Appendix ?

## **B. Description of Criteria and Distribution Formula**

CSBG funds are currently distributed to 22 eligible entities in accordance with both the Alabama Code and CSBG Act utilizing the current poverty guidelines and the 2000 census data. A current Alabama law requires that allocated funds be passed through to the eligible entities to low-income persons in accordance with poverty guidelines. The Recovery Act does not allow for recovery and redistribution of funds.

Services provided with Recovery Act funds must be provided on or before September 30, 2010; with liquidation occurring on or before December 29, 2010. All funds remaining will be reported on the SF-269 and immediately returned to the U.S. Department of Health Human Services.

Prior to distribution of CSBG Recovery Act funds, each eligible entity must submit a work plan for the use of Recovery Act funds. To be approved, a work plan must clearly demonstrate that the manner in which the eligible entity will use and account for CSBG Recovery Act funds will be in full compliance with the mandates of applicable State and Federal laws, rules, regulations, policies and procedures.

All CSBG funds distributed pursuant to the Recovery Act will be awarded to an eligible entity under a single contract with the Department of Economic and Community Affairs ending on September 30, 2010. Eligible entities must fully account for the use and expenditure of all CSBG Recovery Act funds no later than 30 days following the end of the project period.

No CSBG Recovery Act funds will be used by the State for administrative costs. All recipients of CSBG Recovery Act funds must use those funds for the purposes provided for within the CSBG Act and the Recovery Act. Eligible entities are expected to minimize funds used for administrative purposes in accordance with the intent of the Recovery Act and policy guidelines set forth by the U.S Department of Health and Human Services.

## **C. Description of Distribution and Use of Restricted Funds**

The State will purchase a web-based software system that will assist the State and eligible entities with benefits and enrollment coordination activities. This software will be available to all interested eligible entities in the State, as well as the Community Services Division of ADECA.

## **D. State Community Services Program Implementation**

### **1) Program Overview:**

#### **a) The Service Delivery System of Benefit Enrollment Coordination Activities**

The web-based software being offered to the eligible entities will improve service delivery by; improving the eligible entities ability to match customer needs with agency services, expediting the delivery of services, improving information and referral to other services, and providing a more comprehensive case management system for enrolled customers. The software will also provide real time monitoring of all agency activities at all management levels.

#### **b) Description of Recovery Act Projects**

The States eligible entities will be placing emphasis on coordinating and developing programs and linkages that will preserve and create jobs, as well as other activities that will create and sustain economic growth. This will include developing strong partnerships with the State's One Stop Career Centers.

The work plans to be submitted by the local eligible entities will include more detailed projects/programs supported by CSBG Recovery Act funds.

#### **c) The Service Delivery System for Recovery Act Projects**

The provision of CSBG services to individual low-income persons statewide is carried out primarily through Alabama's eligible entities (Community Action Agencies). In accordance with Alabama Code §11-96-1 through 11-96-6 (1994), ADECA will provide 99 percent of its CSBG Recovery Act Allocation to these twenty-two (22) community action agencies for the provision of services in each

applicable CSBG assurance area, as well as additional areas to satisfy the purpose of the Recovery Act. These agencies provide services to low-income people in each of the state's sixty-seven (67) counties. Each community action agency at a minimum, provides information and referral related services to low-income citizens seeking assistance. ADECA will assist in identifying and developing resources and provide technical assistance to the agencies. A list of eligible Community Action Agencies and a map demonstrating the geographic service area of each is included in Appendix ?

**d) Linkages**

A programmatic element of the work plans to be submitted by the community action agencies will include the development of linkages and cooperating agreements locally.

Each will be required to submit a list of the agencies with which they have such agreements. ADECA, through technical assistance and monitoring, as well as through workshops, will continue to foster the development of the local linkages that will fill gaps in services. The State has added a CSBG Partnership Coordinator to the Community Services Division staff.

**e) Coordination with Other Public and Private Resources**

Other public and private resources of funding will be submitted with estimated amounts leverages as part of each community action agency's work plan. The CSBG Recovery Act Work Plan for each agency must include a description of how the agency coordinates and mobilizes public and private resources to provide the services needed to meet the needs of low-income persons.

**f) Innovative Community and Neighborhood-based Initiatives**

Local entities will use the CSBG Recovery Act funds to support innovative community and neighborhood-based initiatives related to the purpose of the CSBG Act and the Recovery Act that promote food, housing, health and employment related services and activities.

## **2) Community Needs Assessments**

Each eligible entity submitted with their FY2009-2010 work plan for regular CSBG funding a community needs assessment. The eligible entities outlined the process used to conduct the assessment and identified how agency leadership used the findings for planning purposes.

## **E. Fiscal Controls**

### **1) State Program Monitoring:**

- a)** Upon receipt of a grant award from the U.S. Department of Health and Human Services, Office of Community Services, ADECA contracts with each of the State's eligible entities that have successfully completed a community action work plan for the grant period via the grant agreement. The grant agreements contain all relevant terms and conditions of the CSBG Recovery Act Program. Each eligible entity is required to concur with the Cash Management Improvement Act, allow access to records for monitoring purposes and to comply with State and Federal regulations.

Each eligible entity that operates on a cash advance basis is required to submit monthly financial reports to ADECA as a condition for receiving additional financial assistance. Through this review/approval process, ADECA monitors the amount of cash on hand at each agency. Each eligible entity is also required to submit a quarterly ROMA report to ADECA. The State utilizes these reports as a means of monitoring agency activity in each of the programmatic categories.

Each eligible entity is required to be monitored within a twelve month period. The onsite review of the eligible entity includes an inspection of the activities being carried out by the entity that are covered by its approved and/or accepted community action work plan, tripartite board meetings, attendance rosters, coordination and linkages with local entities and agencies, and compliance with other applicable State and Federal rules and regulations.

- b)** An onsite review of a newly designated entity will be conducted immediately after the completion of the first six months in which such entity receives funds through the

CSBG Program. A subsequent visit will be conducted at the end of the first twelve months of operation.

- c) As noted above, all eligible entities are monitored on an annual basis. Additional visits are made as deemed necessary when concerns surface regarding financial and/or programmatic issues or when an entity is placed on “high-risk”.
- d) Additional onsite reviews are conducted when specific concerns are identified that require attention or when an entity is placed on “high-risk”. In addition to the annual monitoring onsite visit, staff from ADECA’s Audit Section or Program Integrity Section performs periodic financial/programmatic reviews in coordination with the CSBG staff or at the request of ADECA’s Director or Assistant Director.
- e) Annual audits are required of each local entity. The date of the latest audit conducted and the period covered by the audit for each eligible entity is on file in the Director’s Office, Community Services Division.

## **2) Corrective Action, Termination and Reduction of Funding:**

In the event the Alabama Department of Economic and Community Affairs determines that an eligible entity fails to comply with the terms of an agreement or the State Plan, to provide services under the CSBG program or to meet appropriate standards, goals, and other requirements established by the Federal and State government (including performance objectives), ADECA will:

- a) Inform the entity of the deficiency to be corrected;
- b) Offer training and technical assistance as appropriate to help correct the deficiency, and submit to the Secretary a report describing the training and technical assistance offered or stating the reasons for determining that training and technical assistance was not appropriate;
- c) At the discretion of the State, offer the eligible entity an opportunity to develop and implement, within 60 days after being informed of the deficiency, a quality improvement plan. ADECA may either approve the proposed plan or specify reasons why the proposed plan cannot be approved;

- d) If the deficiencies are not corrected, ADECA will notify the entity of its intent to reduce or terminate funding and the opportunity for a hearing on the impending action. After providing adequate notice along with an opportunity for a hearing, in accordance with State's Eligible Entity Fair Hearing Policy and Procedure (Assurance 676(b)(8)), ADECA may proceed with termination or reduction procedures.

### **3) Tracking:**

To ensure that all awards made under the Recovery Act are distinguishable from non-Recovery Act awards in ADECA's Accounting System, distinctive appropriation and contract records will be established and used to track spending under those awards. In addition, the new reporting and monitoring software will assist in distinguishing those Recovery Act funds from other funds.

## **F. Reporting and Registration Requirements**

- a) All eligible entities will complete projects or activities which are funded under the American Recovery and Reinvestment act of 2009 ("Recovery Act") and will report on use of Recovery Act funds provided through the "Recovery Act" award. Information from these reports will be available to the public.
- b) The reports will be submitted to the required parties no later than ten calendar days after each calendar quarter in which the recipient receives the assistance award funded in whole or in part by the Recovery Act.
- c) Current registrations will be maintained in the Central Contractor Registration ([www.ccr.gov](http://www.ccr.gov)) at all times during which time the federal awards funded with Recovery Act funds are active.
- d) The information described in section 1512© will be reported using the reporting instructions and data elements that will be provided online at [www.FederalReporting.gov](http://www.FederalReporting.gov) and any information that is pre-filled will be corrected and/or updated as needed.