STATE OF RHODE ISLAND
DEPARTMENT OF HUMAN
SERVICES

PUBLIC NOTICE OF PROPOSED DHS STATE PLAN

In accordance to Rhode Island General Laws (RIGL) 42-35 and 42 USC 9008, notice is hereby given that the Department of Human services proposes the following DHS State Plan:

2018-2019 Community Services Block Grant

The Community Services Block Grant (CSBG) is funded through the United States Department of Health and Human Services. The purpose of Social Services Block Grant funding is “to provide assistance to States and local communities, working through a network of community action agencies 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 in rural and urban areas to become fully self-sufficient (particularly families who are attempting to transition off a State program carried out under part A of title IV of the Social Security Act (42 U.S.C. 601 et seq.))”

This proposed intended use plan for CSBG funds for the federal fiscal years 2018 and 2019 are accessible on the DHS website http://www.dhs.ri.gov or available in hard copy upon request (401) 462-1669. A public hearing will be held to consider the proposed plan on Wednesday, August 23, 2017 at 2:00 P.M. at the RI Department of Human Services, Louis Pasteur Building, 57 Howard Avenue, First Floor #110, Cranston, RI 02920 in the West Wing Conference Room. Persons wishing to testify may do so by signing up at the hearing or by submitting written testimony by Wednesday, August 23, 2017 to Frederick Sneesby, Social Services Block Grant Administrator, Department of Human Services, Louis Pasteur Building, 57 Howard Avenue, Cranston RI 02920, or email to frederick.sneesby@dhs.ri.gov.

The hearing will begin at 2:00 P.M. and will conclude when the last speaker finishes testimony or at 4:00 P.M., whichever comes first. The RI Department of Human Services, Louis Pasteur Building is accessible to the handicapped. Individuals with hearing impairments may request an interpreter’s presence by calling 711 or Relay RI 1-800-745-6575 (Voice) and 1-800-745-5555 (TTY). Requests for this service must be make at least 72 hours in advance of the hearing date.

The Department of Human Services does not discriminate against individuals based on race, color, national origin, sex, gender identity or expression, sexual orientation, religious belief, political belief or handicap.
Designation of Lead Agency
The Rhode Island Department of Human Services (RIDHS) has been designated by the Governor as the State agency responsible for the planning and administration of the Community Service Block Grant. RIDHS is charged by state law to “provide public assistance to residents of the state who are in need and who meet the eligibility requirements of the various programs, which constitute public assistance.”

The programs which DHS administers are: RIWorks (TANF); Child Care Assistance Program; Supplemental Nutrition Assistance (SNAP); Long-Term Care; General Public Assistance; State Supplemental Payment; Low-Income Home Energy Assistance; Weatherization Assistance Program; Eligibility for Medicaid; Administration of Grants: Community Service Block Grant, Social Services Block Grant, Family Violence Prevention Services Grant; Refugee Resettlement Grants, Emergency Food Assistance Program grants, state Domestic Violence grants.

Additionally, the department administers programs and services for specific populations and needs through its: Division of Elderly Affairs; Division of Veterans Affairs; Office of Child Support Services; Office of Rehabilitation Services.

Statewide Goals
In fiscal years 2018 and 2019, a maximum of five percent (5%) of CSBG funds allocated to Rhode Island will be retained by DHS for administrative, management, and monitoring expenses relative to CSBG. A minimum of ninety percent (90%) of CSBG funds shall be distributed to Community Action Agencies (CAAs) in Rhode Island in order to maintain the statewide human service delivery network. The remaining 5% will be utilized to provide support for statewide initiatives for CAAs.

The State CSBG-specific goals are:
   a) full implementation of the data warehouse system through all CAAs by the beginning of FFY 2019;
   b) collaborative planning sessions in early calendar year 2018 between CAA leadership and RI Department of Human Services leadership on effectiveness of poverty-reducing
interventions in the state;
c) revision of the State CSBG Manual;
d) in FFY 2018, conducting consultation meetings between the RIDHS Office of Rehabilitation Services and CAAs to address the finding of the statewide Community Needs Assessment that disability is a significant barrier to employment;
e) in FFY 2018 and 2019, following the findings of the statewide Community Needs Assessment, conduct a study of transportation barriers to employment and healthcare facing low-income residents leading to recommendations for solutions;
f) in FFY 2018 and 2019, following the findings of the statewide Community Needs Assessment, convene a workgroup to address the effects of poor credit on low-income residents leading to recommendations for solutions.

Community Services Block Grant Eligible Entities

<table>
<thead>
<tr>
<th>Agency</th>
<th>Municipalities Served</th>
</tr>
</thead>
<tbody>
<tr>
<td>Blackstone Valley Community Action Program</td>
<td>Central Falls, Cumberland, Lincoln, Pawtucket</td>
</tr>
<tr>
<td>Community Action Partnership of Providence</td>
<td>Providence</td>
</tr>
<tr>
<td>Community Care Alliance</td>
<td>Woonsocket</td>
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<tr>
<td>Comprehensive Community Action Program</td>
<td>Coventry, Cranston, Foster, Scituate</td>
</tr>
<tr>
<td>Eastbay Community Action Program</td>
<td>Barrington, Bristol, East Providence, Jamestown, Little Compton, Middletown, Newport, Portsmouth, Tiverton, Warren</td>
</tr>
<tr>
<td>Tri-County Community Action Agency</td>
<td>Burrillville, Charlestown, Glocester, Exeter, Hopkinton, Johnston, Narragansett, New Shoreham, North Kingstown, North Providence, North Smithfield, Richmond, Smithfield, South Kingstown, Westerly, West Greenwich</td>
</tr>
<tr>
<td>Westbay CAP</td>
<td>East Greenwich, Warwick, West Warwick</td>
</tr>
</tbody>
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State Use of Funds
Five percent (5%) of Fiscal Year 2018 and 2019 CSBG funds allocated to Rhode Island will be available for statewide special projects that benefit CSBG and all CAAs. No less than ninety percent (90%) of Fiscal Year 2018 and 2019 CSBG funds allocated to Rhode Island shall be distributed to Community Action Agencies in order to maintain the statewide human service
Distributions to CAAs in Federal Fiscal Year 2018 and 2019 will be made on the following basis:

1. A baseline amount distributed equally to support essential administrative and managerial functions;
2. An amount based on the percentage of the incidence poverty in the service area of each agency as compared to the statewide incidence of poverty, derived from the United States Census Data;
3. The allocation for each subgrantee will be subject to an application for funds process which is designed to promote the purposes of the Community Services Block Grant. All eligible entities (CAAs) requesting CSBG funds submit a CSBG application in the format prescribed by the state;
4. Projected allocation amounts, program requirements, plan criteria, and other pertinent data are distributed annually. CAAs are required to include a copy of their latest Community Needs Assessment [676(b)(ll)].

RIDHS enters into contracts with each agency and invoices and reports are submitted according to those contracts. The whole contracting process takes approximately six weeks to complete. Invoices are paid through purchase orders assigned by State Accounts and Control in the RI Department of Administration. All invoices are paid net thirty. CAAs submit monthly fiscal reports and annual program reports.

Projected allocation amounts, program requirements, plan criteria, and other pertinent data are distributed annually. CAAs are required to include a copy of their latest Community Needs Assessment [676(b)(ll)].

State Linkages and Communication
The Low Income Home Energy Assistance Program, the Weatherization Program, the Temporary Assistance for Needy Families program, the state Head Start Office, the Supplemental Nutrition Assistance Program, the Refugee Resettlement Program, the Social Services Block Grant, the Family Violence Prevention Services grant, the Emergency Food Assistance Program, the state Division of Veterans Affairs, the state Office of Rehabilitation Services, the Division of Elderly Affairs, and the Office of Child Support Services are all administered by the RI Department of Human Services (RIDHS). Executive Directors of all the eligible entities meet regularly with the director of RIDHS as well as the Associate Director of the major benefit programs. Additionally, the coordinator of CSBG for the state meets more frequently with the executive directors. Information and coordination of services and programs are shared at these meetings.

RIDHS also participates in the Governor's Workforce Board along with the Department of Labor and Training to implement the Workforce Innovation and Opportunity Act. Additionally, RIDHS can provide linkages with the state Department of Education and with the non-profit network throughout the state to ensure that the mission of the eligible entities is supported and advanced. Additionally, RIDHS can provide linkages with the state Department of Education and with the non-profit network throughout the state to ensure that the mission of the eligible entities is
supported and advanced.

The RI Department of Human Services communicates with nearly every human service provider in the state and the eligible entities maintain strong relationships with a wide spectrum of providers. The accessibility and provision of services is discussed at regular meetings with eligible entities and is a point of examination in the administration of federal and state funds through the contracting process. Current and previous year's efforts include areas such as participation in community-wide coordinating and planning councils, utilizing cross referrals among local human services agencies and participating in electronic network groups.

The seven CAAs service the entire state. Each agency has developed a service delivery system unique to its community's needs and financial resources. However, common to all agencies is: their networking, coordination and collaboration with local public and private emergency service providers in meeting clients' emergency needs; their assessment of client non-emergency needs and the effective coordination of CAA and local area services for maximum benefit to the client; and the delivery of services in such a way as to foster self-sufficiency rather than dependency. All eligible entities work closely with each other, local service providers, and a statewide 2-1-1 referral system that would enlist provision of services where there are gaps identified.

The RI Department of Human Services links with the WIOA system through TANF and SNAP activities. Participation in WIOA by eligible entities takes place through local workforce boards that are, in turn, part of the Governor's Workforce Board. The RI Department of Human Services also administers Low-Income Home Energy Assistance, partnering with eligible entities throughout the state to deliver emergency energy crisis intervention. RIDHS contracts with eligible entities to do eligibility verification and enrollment for LIHEAP for all communities in the state.

The State and eligible entities in the State will, to the maximum extent possible, coordinate with and form partnerships with other organizations serving low-income residents of the communities and members of the groups served by the State, including community organizations, charitable groups and religious organizations. Eligible entities report their collaborations with these other organizations to the state on a yearly basis as part of the contracting process.

Many of the CAAs in RI use a portion of their CSBG funds to support management costs of their direct service programs, as well as for central operational/administrative costs, and the coordination of public and private resources is one of their most outstanding characteristics. They coordinate the vast majority of their programs with public and private resources and have both verbal and written agreements concerning coordination, referrals, exchange of information, specific services to be provided, funding, volunteers, etc. Examples of public resources include: health care providers; housing development authorities; public utilities; One Stop centers; Federal grantors; etc. Examples of private resources include: volunteers, mentoring and literacy coalitions; child and senior care providers; churches, food pantries, United Way, and local foundations.

The State Community Action Association meets monthly with all eligible entities in the state. The State CAA coordinates advocacy and legislative efforts, training, common projects such as
the development of a system of data warehouses in the eligible entities, and shared concerns. The state CSBG coordinator meets regularly with the group and also with the director of the state CAA.

Monitoring of Eligible Entities
In order to determine whether eligible entities meet the performance goals, administrative standards, financial management requirements, and other requirements of the State and the Office of Community Services, the State shall conduct the following reviews of eligible entities:

A full onsite review of each such entity at least once during each 3-year period.
1. An onsite review of each newly designated entity immediately after the completion of the first year in which such entity receives CSBG funds.
2. 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.
3. Other reviews as appropriate, including reviews of entities with programs that have had other Federal, State, or local grants terminated for cause.

Corrective Action; Funding Termination or Reductions (678C)
If the State determines, based on a final decision in a review, that an eligible entity fails to comply with the terms of an agreement, or the State Plan, to provide services under this subtitle or to meet appropriate standards, goals, and other requirements established by the State or Federal government (including performance objectives), the State shall:
1. inform the entity of the deficiency to be corrected;
2. require the entity to correct the deficiency;
3. if appropriate, offer training and technical assistance to help correct the deficiency and prepare and submit to OCS a report stating what was determined and why;
4. the State, taking into account the seriousness of the deficiency and the time reasonably required to correct the deficiency, can allow the entity to develop and implement, within 60 days after being informed of the deficiency, a quality improvement plan to correct such deficiency within a reasonable period, as determined by the State. The State has no more than 30 days after receiving an eligible entity's proposed quality improvement plan to either approve the proposed plan or specify the reasons why the proposed plan cannot be approved;
5. after providing adequate notice and an opportunity for a hearing, initiate proceedings to terminate the designation of or reduce the funding of the eligible entity unless the entity corrects the deficiency;
6. The state will collaborate with the statewide CAA network to facilitate the best solution for the betterment of the program and the network;
7. Any eligible entity having their funding suspended, terminated or reduced will be informed in writing of their right to an appeal. The following procedures will be implemented:
   • the state will notify the eligible entity in writing of the pending action;
   • the eligible entity will have 30 working days to request a hearing;
   • the state will conduct a hearing within 20 working days of the request to determine that cause existed;
• the state will make a decision within 10 working days of the hearing.

8. The hearing will be conducted on the record and follow CSBG procedures;
9. Any determination made by the state shall be subject to review by OCS.

**Repayment (678D(a)(3))**

If in the monitoring process, expenditure is found not to comply with a Federal and/or State regulation that expenditure will be disallowed and will have to be repaid to the State.

**Fiscal Controls, Audits, and Withholding (678DJ)**

The State will review the CAAs' fiscal control and fund accounting procedures to insure the proper use of and accounting of CSBG funds.

The State, through the contracting process, establishes the CAAs are subject to but not limited to the following:
1. cost and accounting standards of the Office of Management and Budget;
2. an audit, at least every year;
3. appropriate books, documents, papers, and records are available for review.

In accordance with Section 678D, fiscal control and fund accounting procedures have been established which assure the proper disbursal of and accounting for federal funds paid to the state under this subtitle including procedures for monitoring the assistance provided under this subtitle. Monthly financial reports with attendant expenditure documentation are required of all CSBG Sub-recipients and are a condition of payment under the contract. All Sub-recipients are also required to have an annual agency audit conducted by independent auditing entity; the audits must be constructed in accordance with accepted accounting principles. DHS, as a state agency is subject to annual audits by the Office of the Auditor General, in accordance with the 2 CFR Â§ 200 and generally accepted government auditing standards. On-site program and fiscal monitoring will be conducted by DHS for all CSBG Sub-recipients at least every three years.

The purpose of CSBG monitoring is to provide a comprehensive review of each CAA that considers: - financial/administrative management, programs and services, strategic planning, evaluation and results, human resource management, linkages and collaborations, leadership and governance. In accordance with Subsection 678D, an audit of its expenditures of amounts received under this subtitle and amount transferred to carry out the purposes of this subtitle will be submitted to eligible entities at no charge, to the legislature of the state and to the secretary upon request. Also, contracts with CSBG Sub-recipients contain provisions regarding required fiscal procedures and addenda to the contract detailing additional fiscal requirements.

**Individual and Community Income Eligibility Requirements**

The income and asset eligibility for services and the definition of family/household composition depends on the particular program or funding source. For example, for the LIHEAP/Weatherization eligibility determination, the income standard is 60% of state median income. For services and programs for which there is no prescribed federal or state income, asset or household composition standard, the eligible entities used the 125% FPL standard. Intake case records are required and kept in client tracking systems that can be examined by the state.
Plans are reviewed to ensure that location, access, and enrollment requirements are directed to low-income people.

**Results Oriented Management and Accountability (ROMA) System**

Through the application and contracting process, the State requires eligible entities to provide assurance of participation in the Results Oriented Management and Accountability System for measuring performance and results that meets the CSBG requirements and describe the outcome measures to be used to measure eligible entity performance in promoting self-sufficiency, family stability, and community revitalization, and provide information describing how these assurances will be carried out.

RIDHS focuses the work of the eligible entities on the six anti-poverty goals of CSBG against which they can measure their organizations and the impact their services are having. Additionally, RIDHS has tied the national performance measures with the goals and require the eligible entities to submit a work plan using that matrix of goals and measures. Regular needs assessments are also required that help to define the eligible entities’ mission and strategies to address poverty.

The state, along with the Community Action Association and the eligible entities are also completing a data-gathering project that will help to guide assessment and planning, a useful tool for ROMA. The state has also supported the training of two people certified in ROMA to give assistance to all eligible entities for ROMA, and a Certified Peer-Expert Reviewer to assist entities as needed.

**CSBG Programmatic Assurances and Information Narrative**

The eligible entities are required to submit, among other things, a Work Plan as part of the funding application process, and to ensure that all activities under this plan must demonstrate a significant contribution toward the goals and the purposes of the CSBG Act. Special program activities supported directly or indirectly by CSBG funds may include, but are not limited to, the following:

1. Employment services including vocational/career counseling, training, placement, youth and senior employment programs
2. Education programs including Head Start, day care, other preschool programs, tutorial programs and adult education programs
3. Consumer education and information projects including nutritional education and counseling, energy conservation training program, consumer counseling and education programs, and consumer program for senior citizens
4. Housing assistance programs including supportive activities for low-income energy assistance and weatherization programs and crisis intervention and emergency shelter
5. Emergency services including loans and grants to meet immediate and urgent individual and family needs such as health services, food, housing, and employment related assistance
6. Nutrition services including senior meals and child care feeding programs, emergency food programs, surplus commodity projects, community food and nutrition
7. Projects that promote self-sufficiency which may include vocational counseling and training programs, health and mental health services, alcohol and substance abuse, day care and geriatric day care
8. Projects that promote community involvement and participation including coordination and training mechanisms designed to increase the skills and abilities of eligible programs participants. Projects that promote more effective use of programs and services including public safety, improving relationships with law enforcement, information and referral, community outreach and transportation services.
9. Health center services including general medical and dental clinics as well as services in testing and laboratory services.
10. Services to older Americas including senior meals programs, geriatric day care, employment and recreational projects, consumer education, assistance to homebound older person low income energy assistance and nutritional programs including direct commodity distribution.

Through the funding applications, the contracting process, regular meetings with all eligible entities RIDHS will ensure that grant funds will be used in ways that maximize the effectiveness of programs and services related to the purposes of the CSBG Act. The RI Department of Human Services is well positioned to evaluate the coordination and effectiveness of government and non-government public welfare programs because of the programs for which it is responsible (RIWorks, Child Care Assistance Program, Supplemental Nutrition Assistance (SNAP), Long-Term Care, General Public Assistance, State Supplemental Payment, Low-Income Home Energy Assistance, Weatherization Assistance Program, Eligibility for Medicaid, Administration of Grants: Community Service Block Grant, Social Services Block Grant, Family Violence Prevention Services Grant; Refugee Resettlement Grants, Emergency Food Assistance Program grants, state Domestic Violence grants, Division of Elderly Affairs, Division of Veterans Affairs, Office of Child Support Services, and Office of Rehabilitation Services).

Also, the RIDHS is part of a larger state secretariat that coordinates the work of the RIDHS, the RI Department of Health, the RI Department of Children, Youth & Families, and the RI Department of Behavioral Healthcare, Developmental Disabilities, and Hospitals. RIDHS also has working relationships with the RI Department of Labor & Training, the RI Department of Education, and the RI Office of Housing and Community Resources. All eligible entity activity can be aligned with the initiatives of these agencies.

Given the size of our state and local resources, all eligible entities actively participate in local networking and planning organizations, including multi-purpose collaborative bodies, human service coordinating bodies, workforce development boards, etc. As participants, they take an active role in identifying gaps in services and join with community leaders and service providers in planning and developing methods of getting services where they are needed. This is articulated in their annual CSBG application. Depending on the menu of services and programming at each eligible entity, low-income individuals and families have many portals through which to access services: health centers, food pantries, education sessions, child care elder care, community meetings, etc.

Additionally, the field office of the RIDHS also act as portals and referral points to eligible entity...
services. Eligible entities engage in community outreach and maintain a strong network of partnerships with social service, healthcare, government, and civic organizations through which they engage low-income families and individuals. Coordinated and structured assessments are done by all eligible entities for those who seek assistance in any way so that an informed referral can be made or a suitable service provided. A description of the service delivery systems of the eligible entities is included in the annual funding application to the state.

Regular needs assessment, both by the individual eligible entities and statewide, consistently prompts the eligible entities to recognize and respond to emergent needs with new programming. Discussion between the state and the eligible entities about what assessments reveal will call for appropriate initiatives. Current examples of this are new programs addressing behavioral health issues, re-entry programs for released prisoners, and wealth building programs to address disparities. These are shared and encouraged through the Community Action Association. Funds from this grant have been and can be used together with other revenue streams to make new initiatives possible.

In order to receive funding, the eligible entity must submit a Work Plan that describes how the agency will meet the needs identified in its needs assessment summary, categorized by the following areas: basic/emergency needs, education, employment, housing, economic development, community development, health, public safety, and other needs. Additionally, RIDHS coordinates the Emergency Food Assistance Program with all the eligible entities and with the statewide Rhode Island Food Bank and the federal commodities program.