

Wyoming Community Services Block Grant (CSBG)

American Recovery and Reinvestment Act (ARRA)

Program Final Report

July 1, 2009 through September 30, 2010



**Wyoming Department of Health
Rural and Frontier Health Division
Community Services Programs
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January 2011

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COMMUNITY SERVICES BLOCK GRANT (CSBG)
AMERICAN RECOVERY AND REINVESTMENT ACT (ARRA) PROGRAM
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<u>Category</u>	<u>Expended</u>
ARRA Funds; Local Governments/Eligible Entities	\$4,316,066.34
ARRA Funds; Wind River Reservation	\$633,000.00
Total Expenditures	<u>\$4,949,066.34</u>
ARRA Funds Unexpended; Returned to U.S. Treasury	\$50,933.66

Local Statewide Programs' Summary

Contractors Utilized	15
Service Providers Utilized	100

Total # of Jobs Created or Retained: 105

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<u>National Goals:</u>	Funds Expended:	% of Total:	People Assisted:	% of Total:
<u>Self-sufficiency:</u>	\$1,039,303.93	21%	4,073	21%
<u>Community Development:</u>	\$ 890,831.94	18%	3,491	18%
<u>Stake-holding:</u>	\$ 593,887.96	12%	2,327	12%
<u>Community Partnerships:</u>	\$ 890,831.94	18%	3,491	18%
<u>Capacity Building:</u>	\$ 692,869.29	14%	2,715	14%
<u>Family Stabilization:</u>	\$ 841,341.28	17%	3,297	17%
TOTALS:	\$4,949,066.34	100%	19,394	100%

UNDUPLICATED COUNTS - PEOPLE ASSISTED

The number of people provided assistance represent unduplicated people to the extent possible. These numbers represent “families” (defined as “one family”) or a single person. Because some ARRA services benefit several family members, more people benefit from ARRA services than the unduplicated counts show.

Further, the unduplicated counts reflect only the first service provided for a person or family. Additional services received by that person or family during the program year are not recorded in these unduplicated numbers.

Realistically, there will be some duplication in statewide compilations. Because of time and financial constraints and potential violations of client confidentiality, no attempt has been made to ascertain whether a person or family has received assistance through services in another Wyoming county.

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Compilation of National Goals**

- Goal I** Low-Income People Become More Self-Sufficient (Self Sufficiency)
Number of grantees reporting this Goal: **90**
- Outcome Level: Client/Family
Units of Measure: Consumers, clients, individuals, families, enrollees, participants, and households
Type of Change: Status, family functioning, attainment, and achievement
Dimensions of Change: Income, education, family functioning, transportation, employment, housing, basic needs, community involvement, substance abuse, childcare, and health
- Goal II** The Conditions in Which Low-Income People Live are Improved (Community Revitalization)
Number of grantees reporting this Goal: **76**
- Outcome Level: Community level
Units of Measure: Wards, counties, townships, districts, neighborhoods, territories, and reservations
Type of Change: Systems functioning, systems capacity, or community conditions
Dimensions of Change: Public policy, equity, civic capital, service and support systems, and economic opportunity
- Goal III** Low-Income People Own a Stake in Their Community (Community)
Number of grantees reporting this Goal: **50**
- Outcome Level: Community level
Units of Measure: Wards, counties, townships, districts, neighborhoods, territories, and reservations
Type of Change: Systems functioning, systems capacity, or community conditions
Dimensions of Change: Public policy, equity, civic capital, service and support systems, and economic opportunity
- Goal IV** Partnerships among Supporters and Providers of Services to Low-Income People are Achieved (Agency)
Number of grantees reporting this Goal: **77**
- Outcome Level: Agency Level
Units of Measure: Agency, program, employee groups, departments, projects, and bargaining units
Type of Change: Capacity and/or performance
Dimensions of Change: Governance, linkages and relationships, compliance, cultural sensitivity and diversity, equity, workforce environment, planning, measurement, and evaluation, external communications, and information management

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Goal V Agencies Increase Their Capacity to Achieve Results (Agency)
Number of grantees reporting this Goal: **59**

Outcome Level: Agency Level
Units of Measure: Agency, program, employee groups, departments, projects, and bargaining units
Type of Change: Capacity and/or performance
Dimensions of Change: Governance, linkages and relationships, compliance, cultural sensitivity and diversity, equity, workforce environment, planning, measurement and evaluation, external communications, and information management

Goal VI Low-Income People, Especially Vulnerable Populations, Achieve Their Potential by Strengthening Family and Other Support Systems (Client & Family Stability)
Number of grantees reporting this Goal: **74**

Outcome Level: Client and family
Units of Measure: Consumers, clients, individuals, families, enrollees, participants, and households
Type of Change: Status, family functioning, attainment, and achievement
Dimensions of Change: Income, education, family functioning, transportation, employment, housing, basic needs, community involvement, substance abuse, childcare, and health

Eligible entities and subcontractors are not expected to conduct activities or create services to reach each goal. It is understood that grantees provide a wide range of services directed at individuals, families, and community initiatives. In addition, the State and its grantees are continuously looking for ways to improve how to conduct business. Therefore, of the six national goals, each focuses on one of three areas:

- One client or family at a time (Client and Family);
- A community system or condition (Community); or
- An agency or program (Agency).

Consequently, if the services of a respective agency were designed to have an impact on low-income people one client or family at a time, they would not be expected to adopt a goal designed to measure a community condition or system. The same holds true if a respective agency is more directed toward community conditions or systems. They would adopt a goal designed to measure change in community systems or conditions. Obviously, some agencies may choose to direct their efforts to projects that relate to any combination of the three areas.

MISSION STATEMENT

The Mission of Wyoming's CSBG Program is to use all available local, state, federal, and private sector resources to provide a range of services and activities to solve problems and remove obstacles caused by poverty conditions, thereby enabling low-income individuals and families to attain the skills, knowledge, and opportunities that they need to become economically self-sufficient.

PROGRAM ADMINISTRATION

Program Responsibility

Program management consists of administration by the State of Wyoming, Department of Health (WDH), Rural and Frontier Health Division (RFHD), Community Services Program (CSP). The CSP also administers the U.S. Housing and Urban Development (HUD) Emergency Shelter Grant Program (ESG), the End Stage Renal Disease (ESRD) Program, and Wyoming Cares/Wyoming Shares (WCWS) Program.

Administrative Services

The two CSP staff people responsible for CSBG (including ARRA) are located in Cheyenne, which is Wyoming's capital. Functions include planning, research and analysis, data collection, forms development and control, contract preparation, grant award agreement review and processing, payment processing, management information systems, reporting, technical assistance, and dispute resolution; and it acts as the lead agency in Wyoming State Government for low-income issues and coordination with all human services programs, both on a state and a local level. The assurance of compliance with all applicable federal and state rules and regulations are a major responsibility and function.

Grantee Services

All Wyoming CSBG ARRA grantees are official CSBG "eligible entities," having been designated by CSP after meeting requirements mandated by the CSBG Act changes beginning for FFY 2000.

Grantee services and functions include grant award agreement development, grant award agreement management, service provider grants' review, monitoring and evaluation, technical assistance, training, resource mobilization, and the improvement of coordinative relationships between agencies both in the public and the private sectors.

Sub-grantee (or service provider) services and functions include application preparation to contractors, assisting contractors with community action plans, reporting and related forms of data collection, and the normal array of functions that relate to the provision of assistance to low-income people.

Support Services

Support services are connected to both administrative and grantee services, providing clerical and administrative support and follow-up. More specific functions include clerical, keyboard, filing, records maintenance, travel arrangements, and related functions related to contract management.

Fiscal Services

Fiscal services are provided by CSP staff, RFHD Financial Manager, and also members of the WDH's fiscal services program. After that point, actual payments are made by the State Auditor's Office.

Legal Services

Legal assistance is provided by the Office of the State Attorney General. This office approves and signs each contract between the State WDH/CSP and CSBG ARRA contractors. The Office also provides legal assistance in those cases where legal representation and/or legal advice is needed.

Legislative Services

Legislative activities related to the CSBG are provided by the State Legislative Services Office (LSO) which sets up the CSBG legislative and public hearings as required by federal law. Further, inquiries from State legislators come either directly to the CSP Office, or oftentimes through the LSO, to the CSP.

ADMINISTRATIVE ACCOMPLISHMENTS**Funding**

The level of CSBG ARRA funding was \$5,000,000.00. Administration of CSBG ARRA activities was funded by FFY 2010 CSBG funds or by non-federal funds at the local level since no administration funds were allowable through the CSBG ARRA funding criteria.

Management and Accountability

In FFY 1999, the CSP established its version of Results Oriented Management and Accountability (ROMA), *WyoROMA*, on a limited basis with the intent of requiring all contractors and subcontractors to operate on the system for the FFY 2000 CSBG Programs. *WyoROMA* is a total management tool, combining the elements of ROMA, the principles of strategic planning, and the old CSBG management and accountability system. *WyoROMA* begins at the planning point and is correlated with the overall reporting, monitoring, and evaluation phases of the CSBG Program. Re-tooling and on-going improvement of the system has taken, and will continue to take, further information and technical assistance to contractors and service providers (subcontractors) alike.

Program Monitoring and Certification

Program monitoring and certification is being accomplished by CSP staff aside from the monitoring accomplished from the contractors to the service providers. Program monitoring is carried out in accordance with the Wyoming CSBG monitoring procedures as detailed in the Wyoming CSBG American Recovery and Reinvestment Act State Plan and ARRA monitoring is conducted separately from other CSBG monitoring. State-level monitoring by the CSP includes both on-site monitoring of contractors and service providers, along with desk-monitoring (analysis of monthly fiscal and performance reports from contractors and service providers). The impetus behind monitoring is the compliance with all applicable rules and regulations, most notably the requirements in the federal assurances and certifications which the State is required to discharge, as well as determining that those same assurances and certifications are passed on to the contractors and service providers, as applicable.

Technical Assistance

CSP staff routinely provides technical assistance to grantees and services providers as requested, and/or as deemed necessary. Board, staff, and service provider training is also provided on request, either directly by CSP personnel or through contract arrangements with outside professional trainers. Since CSBG ARRA funding can not be used for these activities, they are provided through regular CSBG funds.

The largest demand for technical assistance from grantees and service providers has been for: needs assessments; development of community action plans; board development, case management, program monitoring and/or evaluation; community capacity building; grant writing; strategic planning, coordination or collaboration and partnerships improvements; management information systems; and citizen participation.

Fiscal Monitoring/Management

Local contractors and service providers alike are required to submit into cmReporter (Wyoming's CSBG Database) standardized, monthly financial reports which detail by budget cost category the expenditure of CSBG funds, along with other appropriate information. CSBG ARRA activities are reported separately from other CSBG activities. The CSP reviews these financial reports for consistency with the currently approved budget, noting any unusual expenditure patterns or inconsistencies. CSBG funds are the primary focus of each review. However, the scope of reviews provide a comprehensive picture of the fiscal integrity of the respective local agencies, be they contractors or service providers, as well as a general review of fiscal activities as correlated with monthly performance reports; (i.e., people provided assistance by service categories and other pertinent information).

Audit of Funds/Local Levels

Each CSBG grantee and all sub-grantees (service providers) are required to have annual audits conducted for each agency fiscal year in which CSBG funds were received, for all entities expending in excess of \$500,000 per year from all federal sources. Such audits must have been conducted by an independent certified public accountant in accordance with the applicable OMB (Office of Management and Budget) audit circular and WDH/CSP audit guidelines.

Audit of Funds/State Level

State operation of the CSBG program, including CSBG ARRA, is audited annually by an independent auditor in accordance with OMB Circular A-133. Copies of such audits are forwarded to the U.S. Department of Health and Human Services (DHHS) as required.

IMPEDIMENTS AND RESOLUTION

CSBG grantees and sub-grantees (service providers) are normally challenged by many impediments in their efforts to help people move from dependency toward self-sufficiency. Grantees and sub-grantees identify these impediments in their applications and plans to the State CSP, and many describe efforts made to respond to such impediments.

In most areas, impediments relate to the impacts of welfare reform, lack of immediate emergency assistance, (i.e., food, clothing, shelter, and related), lack of public or personal transportation (public transportation is rare in Wyoming communities), the need for affordable and safe housing, the need for medical care for people who are

unable to provide their own and who are not eligible for other programs such as Title XIX (Medicaid), Medicare, and others, and providing assistance to small communities that are very, very remote. Most Wyoming towns are not only “rural,” but meet the criteria of “pioneer” or “frontier” communities. Some counties in Wyoming have population densities of less than three people per square mile. Only two Wyoming towns have populations over 50,000. Correlate this with the fact that Wyoming is one of the largest states in area, and obvious problems become very apparent.

In addition, CSBG grantees and sub-grantees have to face their own internal, institutional and organizational needs, including the need for more staff, more space, the need for privacy and confidentiality of clients, updated communication and computer systems, impact of funding and/or budget cuts, the escalated need for long-term services, and the high cost for providing transportation and other services to extremely rural and isolated areas.

CSBG service providers see annual increases in their client loads for various reasons. Wyoming’s economy relies heavily on natural resource development, which attracts at-risk families who follow the oil field and mining employment opportunities. This phenomenon has been addressed through studies of “boom and bust” societies, particularly in the energy producing western states.

One of the largest problems in Wyoming is the “under-employed” population. It is very common for family members to be holding several jobs in order to make ends meet. Many of these jobs are in the service industry, (i.e., fast foods, discount stores, and related ventures); and they do not work enough hours to warrant fringe benefits and/or an overall living wage. In addition, many Wyoming service industry jobs are seasonal (i.e., camping, fishing, skiing seasons, etc.).

Service providers observe that clients encounter a number of barriers to self-sufficiency, including: lack of transportation (personal and public) to jobs and training, lack of childcare and daycare, and lack of appropriate clothing for jobs.

In terms of resolutions for clients who were formerly welfare recipients, CSBG service providers develop educational and training programs to help clients prepare for employment. More importantly, they collaborate with other local agencies (both public and private sector) to develop jobs, create new job search mechanisms, and locate employment opportunities. Providers transport clients more than in the past, help prepare resumes, develop classes and instruction on job interviews, and utilize other employment-related areas as well.

Service providers have noted generally that while they were able to provide emergency assistance when they could (food, clothing, shelter, etc.), that long-term, comprehensive services were absolutely necessary in order for many families to

become self-sufficient. Limited funds and other limited resources severely hamper providers' efforts to provide long-term assistance for ultimate self-sufficiency.

STATUTORY COMPLIANCE

Statutory Requirements

The CSBG Act, as amended, mandates that the State provide an annual prior year report which contains a narrative description of how the State met its goals and objectives and information on the types of projects supported with CSBG funds. The State of Wyoming has complied with this mandate through this report, which also is submitted to the Governor, the State Legislature, and many other diverse people and organizations.

The report clarifies the specific goals and objectives of the program, provides information on the types of activities and services that were provided, the geographical areas served, the characteristics of the people served, the criteria and method established for the distribution of funds, a description of the review and comment process, and other related information.

Distribution of Funds

CSBG ARRA funds were distributed in the manner authorized by the CSBG Act and further approved by the Wyoming State legislature. 100% of the CSBG ARRA funding expended was granted directly to public or private nonprofit organizations which have a board that meets the requirements of Section 675(c)(3) of the CSBG Act.

The funding formula for local projects that was developed by the State and which has been approved by the State Legislature each year embodies the concept of equity throughout the State, based upon the need for low-income services.

As in prior years, the base of the formula was: (1) the number of low-income persons (as defined by the OMB Poverty Guidelines) within each county; or simply, the percent, by county of the total State low-income population. The other factors included in the formula consist of: (2) the number of unemployed people in each county; (3) the number of people receiving Food Stamps; (4) the number of people on Title XIX (Medicaid); (5) the number of people on Temporary Assistance for Needy Families (TANF) or Wyoming's version of TANF, which is Personal Opportunities With Employment Responsibilities (POWER); (6) people receiving social services from the Department of Family Services; (7) the number of applications received by the Department of Family Services for financial and/or social services; and (8) the number of people receiving Social Security Insurance benefits.

Expenditure of Funds

Expenditure of funds detailed by service category along with the numbers of people assisted by service category, as well as other appropriate information, is found in this report in the "Summary of Service Categories Performance & Expenditures For Program Ending 9-30-10" Section.

Public Input Requirement

A legislative and a public hearing was conducted in Sheridan, Wyoming by the Joint Labor, Health and Social Services Interim Committee on September 9, 2009, for the purpose of soliciting input from lawmakers, prospective CSBG grantees, and the general public. Notices of intent of hearings were published in newspapers around the State, as well as the statewide newspaper, the Casper Star-Tribune. The hearings were sponsored by the Wyoming CSP and the Wyoming LSO.

CSBG eligible entities on the local level were required to conduct public hearings relative to the use of local CSBG ARRA funds for the purpose of soliciting input from the general public. Such hearings were all advertised in the respective local newspapers for at least ten (10) days, encouraging review and comment on the use of CSBG funds in respective local areas. Such notification of public hearings and the conducting of public hearings are formal requirements from the State CSP for the local application process in order to apply for CSBG ARRA funds.

Local applications to the CSP are required to provide formal documentation of both the notification of hearings and the proceedings of such hearings. The position of the CSP is that this requirement is invaluable for the success of the CSBG.

Compliance with Federal Assurances

Pursuant to P.L. 97-35, Section 675(c), as amended, and as part of the annual application required by subsection (a) of that law, the State of Wyoming has agreed to comply with assurances contained herein. Following are the assurances recognized by the State of Wyoming and statements which indicate compliance with each assurance.

Assurance #1: Services and Activities (Section 676(b)(1))

- (1) To support activities that are designed to assist low-income families and individuals, including families and individuals receiving assistance under part A of Title IV of the Social Security Act (42 U.S.C. 601 et seq.), Homeless families and individuals, and elderly low-income individuals and families to enable the families and individuals to:

- (a) remove obstacles and solve problems that block the achievement of self-sufficiency (including self-sufficiency for families and individuals who are attempting to transition off a State program carried out under part A of the Title IV of the Social Security Act);
 - (b) secure and retain meaningful employment;
 - (c) attain an adequate education, with particular attention toward improving literacy skills of low-income families in the communities involved, which may include carrying out family literacy initiatives;
 - (d) make better use of available income;
 - (e) obtain and maintain adequate housing and a suitable living environment;
 - (f) obtain emergency assistance through loans, grants, or other means to meet immediate and urgent family and individual needs; and
 - (g) achieve greater participation in the affairs of the communities involved, including the development of public and private grassroots partnerships with local law enforcement agencies, local housing authorities, private foundations, and other public and private partners to document best practices based on successful grassroots intervention in urban areas, to develop methodologies for widespread replication, and strengthen and improve relationships with local law enforcement agencies, which may include participation in activities such as neighborhood or community policing efforts.
- (2) To address the needs of youth in low-income communities through youth development programs that support the primary role of the family; give priority to the prevention of youth problems and crime; promote increased community coordination and collaboration in meeting the needs of youth; and support development and expansion of innovative community-based youth development programs that have demonstrated success in preventing or reducing youth crime, such as programs for the establishment of violence-free zones that would involve youth development and intervention models (i.e. models involving youth mediation, youth mentoring, life skills training, job creation, and entrepreneurship programs); and after school child care programs; and
- (3) To make more effective use of, and to coordinate with, other programs (including State welfare reform efforts). [Section 676(b)(1)]

Compliance Statement, Assurance #1

The information, statistics and data contained in this report describes compliance with this assurance.

Assurance #2 (Use of discretionary funds) (Section 676(b)(2))

To describe how the State intends to use discretionary funds made available from the remainder of the grant or allotment described in Section 675(c)(b) of the Act in accordance with the Community Services Block Grant Program, including a description of how the State will support innovative community and neighborhood-based initiatives related to the purposes of the Community Services Block Grant Program (Section 676(b)(2)).

Compliance Statement, Assurance #2

The State of Wyoming has complied with the assurance. The Section in this report, "Summary of Expenditures" indicates compliance.

Assurance #3 (Information about eligible entities) (Section 676(b)(3))

To provide information provided by eligible entities in the State, including:

- (1) a description of the service delivery system for services provided or coordinated with funds made available through grants made under Section 675C(a) of the Act, targeted to low-income individuals and families in communities within the State;
- (2) a description of how linkages will be developed to fill identified gaps in services, through the provision of information, referrals, case management, and follow-up consultations;
- (3) a description of how funds made available through grants made under Section 675(a) will be coordinated with other public and private resources; and
- (4) a description of how local entities will use the funds to support innovative community and neighborhood-based initiatives related to the purposes of the community services block grant, which may include fatherhood initiatives and other initiatives with the goal of strengthening families and encouraging effective parenting (Section 676 (b)(3)).

Compliance Statement, Assurance #3

The State of Wyoming has complied with this assurance. Information as stated above is pervasive in this report.

Assurance # 4 (Emergency food and nutrition) (Section 676(b)(4))

To ensure that eligible entities in the State will provide, on an emergency basis, for the provision of such supplies and services, nutritious foods, and related services, as may be necessary to counteract conditions of starvation and malnutrition among low-income individuals (Section 676(b)(4)).

Compliance Statement, Assurance #4

As evidenced by the statistics and data in the report of expenditures and people provided assistance by service category, the State of Wyoming provided a significant amount of food and nutrition assistance.

Assurance #5 (Coordination and linkages) (Section 676(b)(5))

That the State and the eligible entities in the State will coordinate and establish linkages between governmental and other social services programs to assure the effective delivery of such services to low-income programs, to assure the effective delivery of such services to low-income individuals, and to avoid duplication of such services; and State and the eligible entities will coordinate the provision of employment and training activities through statewide and local workforce investment systems under the Workforce Investment Act of 1998 (Section 676(b)(5)).

Compliance Statement, Assurance #5

Coordination and linkages with other programs, both in the public and private sectors, and both on a State and a local level is included in the CSBG ARRA State Plan in detail. The CSBG in Wyoming works with virtually all human services programs.

Assurance #6 (Coordination between anti-poverty programs) (Section 676(b)(6))

To ensure coordination between anti-poverty programs in each community in the State, and ensure, where appropriate, that emergency energy crisis intervention programs under title XXVI (relating to low-income home energy assistance) are conducted in such communities (Section 676(b)(6)).

Compliance Statement # 6

(See Compliance Statement #5)

Assurance #7 (Federal investigations) (Section 676(b)(7))

To permit and cooperate with Federal investigations undertaken in accordance with Section 678D of the Act (Section 676(b)(7)).

Compliance Statement, Assurance #7

In accordance with federal regulations, the State of Wyoming agreed to permit and cooperate with any federal investigations undertaken in accordance with the above law. No federal investigations have been scheduled or conducted since implementation of the CSBG in Wyoming in 1982, including the program year being reported.

Assurance #8 (Proportional share, termination) (Section 676(b)(8))

That any eligible entity in the State that received funding in the previous fiscal year through a CSBG grant will not have its funding terminated, or reduced below the proportional share of funding the entity received in the previous fiscal year unless, after providing notice and an opportunity for a hearing on the record, the State determines that cause exists for such termination or such reduction, subject to review by the Secretary as provided in Section 678 (c) (b) of the Act (Section 676(b)(8)).

Compliance Statement, Assurance #8

Since enactment of the Act in 1999 and the subsequent designation of tripartite boards as eligible entities in Wyoming, several changes have been made to designee organizations. Two entities were initially designated to serve the Wind River Indian Reservation. The Shoshoni Tripartite Board dissolved and, following discussions with tribal members, was de-designated as an eligible entity. The funding that had previously been designated for the reservation is now provided to the Arapaho Tripartite Board, which serves the interest of both tribes. Two entities had been designated to serve one geographical area (Campbell County). Following discussions, public hearings, and an analysis by an independent consulting firm, one of those entities (the Campbell County Council of Community Services) was de-designated, but continues to receive CSBG funding as a sub-grantee of the Campbell County CARE Board. Two counties that had been served through Northwest Community Action Programs of Wyoming, Inc. (NOWCAP) chose to form local tripartite boards and have since been designated as eligible entities in Converse, and Fremont Counties. Each of those counties continues to be funded at the same proportional level as they were under NOWCAP oversight. A tripartite board was formed in Weston County and at the end of the year, the board chose to dissolve rather than continue. Weston

County was formerly served by NOWCAP and once again is served by NOWCAP. A new tripartite board was formed in Teton County, which had previously not been served by CSBG funding. As a result, all twenty-three Wyoming counties and the Wind River Indian Reservation are now served by CSBG funds. In no instance has any program had its funding terminated, or reduced below the proportional share of funding the entity received in the previous fiscal year without the opportunity for a hearing on the record.

Assurance #9 (Partnerships) (Section 676(b)(9))

That the State and eligible entities in the State will, to the maximum extent possible, coordinate programs with and form partnerships with other organizations serving low-income residents of the communities and members of the groups served by the State, including religious organizations, charitable groups, and community organizations (Section 676(b)(9)).

Compliance Statement, Assurance #9

The State places strong emphasis on partnerships and sound working relationships. The CSP, CSBG system in the State includes many religious organizations, charitable groups, and many community organizations.

Assurance #10 (Petition for representation on tripartite board) (Section 676(b)(10))

To require each eligible entity in the State to establish procedures under which a low-income individual, community organization, or religious organization, or representative of low-income individuals that considers its organization, or low-income individuals, to be inadequately represented on the board (or other mechanism) of the eligible entity to petition for adequate representation (Section 676(b)(10)).

Compliance Statement, Assurance #10

Each and every organization that applied for formal CSBG “eligible entity” status beginning with the FFY 2000 programs were required to have a statement in their respective by-laws, along with a formal system in place to accommodate individuals or organizations that considered themselves to be inadequately represented on the eligible entities’ tripartite governing boards.

Assurance #11 (Community Action Plan, including needs assessments)
(Section 676(b)(11))

To secure from each eligible entity in the State, as a condition to receipt of funding, a community action plan (which shall be submitted to the Secretary, at the request of the Secretary, with the State plan) that includes a community-needs assessment for the community served, which may be coordinated with community-needs assessment conducted for other programs (Section 676(b)(11)).

Compliance Statement, Assurance #11

Local grantee community action plans are submitted with the grantee funding application to the CSP, and is a condition for receipt of funds. An annual local needs assessment is one of the required five parts of the community action plans.

Assurance #12 (Participation in ROMA) (Section 676(b)(12))

That the State and all eligible entities in the State will, not later than fiscal year 2001, participate in the Results Oriented Management and Accountability (ROMA) System, another performance measure system for which the Secretary facilitated development pursuant to Section 678(E)(b) of the Act (Section 676(b)(12)).

Compliance Statement, Assurance #12

The State of Wyoming implemented its ROMA System for FFY 99 so that all eligible entities and their respective subcontractors would be fully familiar with the system for FFY 2000. Wyoming's system is essentially a hybrid system consisting of the Governor's Strategic Plan and the national ROMA System. The system is highly detailed in the State CSBG Plan. All grantees and sub-grantees are required to use the system in the different phases of planning, reporting, monitoring, and evaluation.

Assurance #13 (Carrying out of assurances) (Section 676(b)(13))

The State Plan and this Annual Report delineate how the State intends to, and ultimately does, carry out the Federal assurances.

The State's grant award agreement with each grantee requires the grantees and sub-grantees carry out the Federal assurances (as appropriate, as several only relate to the State Government). Signed assurances and explanations of

implementation of such assurances are a requirement for grantees and sub-grantees applications for CSBG funds.

ADMINISTRATIVE ASSURANCES

The State has complied with the following, as required under the Act:

- (1) Has submitted an application to the Secretary containing information and provisions that describe the programs for which assistance is sought under the Community Services Block Grant Program prepared in accordance with and containing the information described in Section 676 of the Act (Section 675A(b)).
- (2) In the event that the State elects to recapture and redistribute funds to an eligible entity through a grant made under Section 67C(a)(1) when unobligated funds exceed 20 percent of the amount so distributed to such eligible entity for such fiscal year, the State agrees to redistribute recaptured funds to an eligible entity, or require the original recipient of the funds to redistribute the funds to a private, non-profit organization, located within the community served by the original recipient of the funds, for activities consistent with the purposes of the Community Services Block Grant Program (Section 675C(1)(3)).
- (3) In states with a charity tax credit in effect under state law (not Wyoming), the State agrees to comply with the requirements and limitations specified in Section 675(c) regarding use of funds for statewide activities to provide charity tax credits to qualified charities whose predominant activity is the provision of direct services within the United States to individuals and families whose annual incomes generally do not exceed 185 percent of the poverty lien in order to prevent or alleviate poverty among such individuals and families (Section 675(c)).
- (4) The lead agency will hold one hearing in the State with sufficient time and statewide distribution of notice of such hearing, to provide to the public an opportunity to comment on the proposed use and distribution of funds to be provided through the grant or allotment under Section 675A or 675B for the period covered by the State plan (Section 676(a)(s)(B)).
- (5) The chief executive officer of the State has designated an appropriate State agency for purposes of carrying out State Community Services Block Grant Program activities (Section 676(a)(1)).

- (6) Has held at least one legislative hearing every three years in conjunction with the development of the State plan (Section 676(a)(3)).
- (7) Has made available for the public inspection each plan or revised State plan in such a manner as will facilitate review of and comment on the plan (Section 676(e)(2)).
- (8) To conduct the following reviews of eligible entities:
 - (a) full onsite review of each such entity at least once during each three-year period;
 - (b) an onsite review of each newly designated entity immediately after the completion of the first year in which such entity receives funds through the Community Services Block Grant Program;
 - (c) 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; and
 - (d) other reviews as appropriate, including reviews of entities with programs that have had other Federal, State or local grants (other than assistance provided under the Community Services Block Grant Program) terminated for cause (Section 678B(a)).
- (9) In the event that the State determines that an eligible entity fails to comply with the terms of an agreement or the State plan to provide services under the Community Services Block Grant Program or to meet appropriate standards, goals, and other requirements established by the State (including performance objectives), the State will comply with the requirements outlined in Section 678C of the Act, to:
 - (a) inform the entity of the deficiency to be corrected;
 - (b) require the entity to correct the deficiency;
 - (c) 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 are not appropriate;
 - (d) 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 and to either approve the proposed plan or specify reasons why the proposed plan cannot be approved; and
 - (e) after providing adequate notice and an opportunity for a hearing, initiate proceedings to terminate the designation of or reduce the

funding to the eligible entity unless the entity corrects the deficiency (Section 678(C)(a)).

- (10) Has established fiscal controls, procedures, audits and inspections, as required under Sections 678D(a)(1) and 678D(a)(2) of the Act.
- (11) To repay to the United States amounts found not to have been expended in accordance with the Act, or the Secretary may offset such amounts against any other amount to which the State is or may become entitled under the Community Services Block Grant Program (Section 678D(a)(3)).
- (12) Has participated since FFY 99 and ensured that all eligible entities in the State participate in the Results-Oriented Management and Accountability (ROMA) System (Section 678E(a)(1)).
- (13) Has prepared and submitted to the Secretary an annual report on the measured performance of the State and its eligible entities, as described under Section 678E(a)(2) of the Act.
- (14) Has complied with the prohibition against use of Community Services Block Grant funds for the purchase or improvement of land, or the purchase, construction, or permanent improvement (other than low-cost residential weatherization or other energy-related home repairs) of any building or other facility, as described in Section 678F(a) of the Act.
- (15) Has ensured that programs assisted by Community Services Block Grant funds shall not be carried out in a manner involving the use of program funds, the provision of services, or the employment or assignment of personnel in a manner supporting or resulting in the identification of such programs with any partisan or nonpartisan political activity or any political activity associated with a candidate, or contending faction or group, in an election for public or party office; or any activity to provide voters or prospective voters with transportation to the polls or similar assistance with any such election, or any voter registration activity (Section 678F(b)).
- (16) Has ensured that no person shall, on the basis of race, color, national origin, or sex be excluded from participation in, be denied the benefits of, or be subjected to discrimination under, any program or activity funded in whole or in part with Community Services Block Grant Program funds. Any prohibition against discrimination on the basis of age under the Age of Discrimination Act of 1975 (42 U.S.C. 6101 et seq.) or with respect to an otherwise qualified individual with a disability as provided in Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 12131 et seq.) shall also apply to

any such program or activity (Section 678F(c)).

- (17) Has considered religious organizations on the same basis as other non-governmental organizations to provide assistance under the program so long as the program is implemented in a manner consistent with the Establishment Clause of the first amendment of the Constitution; not to discriminate against an organization that provides assistance under, or applies to provides assistance under the Community Services Block Grant Program on the basis that the organization has a religious character; and not to require a religious organization to alter its form of internal government except as provided under Section 678B or to remove religious art, icons, scripture or other symbols in order to provide assistance under the Community Services Block Grant Program (Section 679).

OTHER ADMINISTRATIVE CERTIFICATIONS

The State also certifies the following:

1. Affirmation of Audit. Has provided Circular A-133 from the Office of Management and Budget (OMB) requiring recipients of the Community Services Block Grant Program funds expending \$500,000 or more in Federal awards during the fiscal year to complete an A-133 audit.
2. Audit. Has provided assurances that cost and accounting standards of the Office of Management and Budget (OMB Circular A-110 and A-122) shall apply to a recipient of Community Services Block Grant Program funds.
3. Child Support Services and Referrals. Pursuant to P.L. 97-35, the State of Wyoming agrees to provide an assurance that requires eligible entities and subcontractors to:
 1. Inform custodial parents in single parent families that participate in programs, activities, or services carried out under the CSBG program about the availability of child support services; and
 2. Refer eligible parents to the child support offices of the state and local governments.
4. Debarment and Suspension. In accordance with 45 CFR Part 76. The state certifies that recipients of CSBG funds shall certify by completion and admission to the state department of "Certification Regarding Debarment, Suspension, and Other Responsibility Matters - Lowers Tier Covered Transactions."

5. Drug-Free Workplace. The State certifies that it has provided a drug-free workplace in compliance with 45 CFR Part 76, Subpart F.
6. Lobbying. In accordance with P.L. 101-121, Section 319, 31 USC (United States Code) 1352 and implementing federal regulations, recipients of CSBG funds are prohibited from using CSBG funds for lobbying. Each grantee must certify by completing and filing with the state department, the Standard Form-LLL, Disclosure of Lobbying Activities. Grantees will also file quarterly updates on the Standard Form-LLL about the use of lobbyists if material changes in lobbying occur. Grantees will ensure that the same certification will be included in all sub-awards exceeding \$10,000.
7. Nondiscrimination. Pursuant to P.L. 97-35, Section 677 (a), as amended, the State of Wyoming certifies that no person shall, on the ground of race, color, national origin, sex, age, or handicap, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under, any program or activity funded in whole or in part with funds made available under this subtitle. Any prohibition against discrimination on the basis of age under the Age Discrimination Act of 1975 or with respect to an otherwise qualified handicapped individual as provided in Section 50 of the Rehabilitation Act of 1973 shall also apply to any such program or activity.
8. No-Smoking Workplace. Has complied with the requirements of Public Law 103-227, Part C Environmental Tobacco Smoke, also known as the Pro-Children Act of 1994, which requires that smoking not be permitted in any portion of any indoor facility owned or leased or contracted for by an entity and used routinely or regularly for the provision of health, day care, education, or library services to children under the age of 18 if the services are funded by a Federal grant, contract, loan or loan guarantee. The State further agrees that it will require the language of this certification be included in any sub-awards, which contain provisions for children's services and that all sub-grantees shall certify accordingly.

