



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

Community Services Block Grant Program

Nebraska State Assessment

On-Site Review

Final

September 28 - October 2, 2009

Nebraska State Assessment

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Nebraska Community Services Block Grant

I. Executive Summary

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

The Governor of Nebraska designated the Nebraska Department of Health and Human Services (NDHHS) as the appropriate state lead agency for the administration of the CSBG program. The Nebraska CSBG program provides funding, technical assistance, and support to nine eligible entities serving 95 counties. The CAAs provided an array of services according to the Community Action Plans (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, money management, and micro-business development. The information contained in this report was compiled for a State Assessment (SA) of the Nebraska Community Services Block Grant program and its eligible entities as evaluated by Federal staff of the Division of State Assistance (DSA) in the Office of Community Services (OCS), an office within the Administration for Children and Families (ACF) of the 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 in adherence 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 the DSA would conduct both on-site and desk monitoring reviews during Federal Fiscal Years 2008-2010. Federal staff conducted an on-site review of the Nebraska CSBG program and its eligible entities on September 28 - October 2, 2009. The evaluation included interviews and analyses of the data collected. As per the statute, the SA examines the State's and its eligible entities' assurances of program operations including:

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

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

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

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

Methodology

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

1. OCS reviewers examined the State-level assurances, as well as fiscal and administrative governance issues regarding the CSBG program, through data collection and interviews with State officials.
2. OCS reviewers assessed the State's monitoring procedures and results to determine the CAA's compliance with assurances and governance requirements through additional data collection and interviews.

State-level interviews included the following Nebraska Housing and Community Services Department officials: Jennifer Dreibelbis, CSBG Program Specialist; Cinde Swartz, Federal Aid Administrator; Don Swartz, Accounting Unit Manager; Karen Parde, State Refugee Coordinator (former CSBG Program Coordinator); Todd Reckling, Division Director; Chris Hanus, Administrator; and Mary Beth Rathe, State CAA Association Director.

OCS reviewers assessed the following entities: Blue Valley Community Action Partnership, Fairbury; Eastern Nebraska Community Action Partnership, Omaha; and Lincoln Action Program, Lincoln.

Office of Community Services reviewers included Isaac Davis, Program Specialist/Team Leader; Michael Pope, Auditor; Emmanuel Djokou, Auditor; and Marie Madzy, Auditor.

¹ Some assurances have been combined where appropriate.

II. Assessment and Findings

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

- Administrative, program, and financial operations for the State and the CAAs assessed;
- Brochures and literature on services provided;
- Most recent CSBG financial summary reports;
- SF 269 Financial Status Report for Fiscal Year (FY) 2006 showing total funds authorized;²
- Audited Financial Statements;
- Nebraska State CSBG Plan;
- Nebraska CSBG Operations Manual.

Fiscal and Governance Operations

The CSBG statute requires each State to designate a lead agency to administer the CSBG program and for the lead agency to provide oversight of the eligible entities that administer programs in the communities. The Governor designated NDHHS as the lead agency to administer the CSBG program. In FY 2006, the State allocated 90 percent of CSBG funds to the eligible entities and CAAs. The State used two percent for administrative activities and eight percent as discretionary funds, which was distributed to the eligible entities.

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

Table 1

| Use of FY 2006 Funds: Nebraska | | |
|---------------------------------------|------------------------|-----------------------------------|
| Uses of Funds | Amount Expended | Percentage of Expenditures |
| Grants to Local Eligible Entities | \$3,935,498 | 90% |
| Administrative Costs | \$ 100,665 | 2% |
| Discretionary Projects | \$ 336,611 | 8% |
| Total Used in FY 2006 | \$4,372,774 | 100% |

According to NDHHS, administrative expenditures were used for the management and monitoring oversight of the program. Discretionary funds were disbursed to the CAAs for their use based on their community needs assessment.

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

Administrative Monitoring and Accountability

The CSBG statute requires States to monitor local agencies to determine whether they meet performance goals, administrative standards, and financial management standards, as well as other state-defined criteria. The State has procedures in place to ensure the CAAs have a system of governance, financial and human resource management, program and service delivery, and community relations. The State requires the CAAs to submit applications to receive their CSBG allotments annually. State policies governing the submission of the annual community action plans and needs assessments are outlined in the Nebraska Health and Human Services Manual, Title 481, Community Services Block Grant Program. The process of approval is based on (1) standard forms, (2) governing board approval, and (3) information about how the entity will provide services in their communities.

Financial Monitoring and Accountability

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

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

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

The NDHHS Manual outlines the State's monitoring procedures and objectives. The Community Services Block Grant Section under the Department of Health and Human Services is responsible for conducting on-site program monitoring visits at least once every three years. On-site monitoring reviews are conducted to meet the following objectives: review of sub-recipient performance; review of compliance to applicable State and Federal regulations, policies, and statutes; prevention of fraud and abuse; and identification of technical assistance needs. State policies also require eligible entities to complete regular self-evaluations and a combined Peer and State on-site reviews in place of the State only on-site review. The CAAs and eligible entities are identified in Table 2 (on the following page).

Table 2

| Nebraska Monitoring Schedule | | |
|--|-----------------------|---|
| Agency Name | On-site Visits | Counties Served |
| Blue Valley Community Action Partnership | March 23, 2006 | Butler, Fillmore, Gage, Jefferson, Polk, Saline, Seward, Thayer, York, and Smith and Jewell in Kansas |
| Central Nebraska Community Services | April 19, 2006 | Brown, Blaine, Boyd, Boone, Custer, Colfax, Garfield, Greely, Hall, Hamilton, Howard, Keya, Platte, Sherman, Valley, Wheeler, and Rock |
| Community Action Partnership of Mid-Nebraska | July 28, 2006 | Adams, Arthur, Buffalo, Chase, Clay, Dawson, Dundy, Franklin, Frontler, Fumas, Gosper, Grant, Harlan, Hayes, Hitchcock, Hooker, Keamey, Keith, Lincoln, Logan, McPherson, Nuckolls, Perkins, Phelps, Red, Willow, Thomas, and Webster |
| Goldenrod Hills Community Action | June 13, 2006 | Antelope, Burt, Cedar, Cuming, Dakota, Dixon, Dodge, Knox, Madison, Pierce, Staton, Thurston, Washington, and Wayne |
| Greater Omaha Community Action | November 8, 2006 | Omaha |
| Lincoln Action Program | June 15, 2006 | Lancaster and Saunders |
| Northwest Community Action Partnership | October 17, 2006 | Box Butte, Cherry, Dawes, Sheridan, and Sioux |
| Panhandle Community Services | August 2, 2006 | Banner, Cheyenne, Deuel, Garden, Kimball, Morrill, and Scotts Bluff |
| Southeast Nebraska Community Action | September 21, 2006 | Cass, Johnson, Nemaha, Otoe, Pawnee, and Richardson |

OCS reviewers examined the State’s monitoring procedures and a representative sample of completed monitoring tools, reports, backup documentation, and corrective action letters. Through documentation reviews and interviews with State staff responsible for monitoring, OCS reviewers determined that State has reasonable and responsible internal controls for conducting monitoring reviews for its eligible entities.

The State’s CSBG program year is from July 1 through June 30. In the last quarter of the State’s calendar year, any costs incurred by the entities prior to the upcoming first quarter are reimbursable subject to the State’s receipt of Federal fiscal year funds.

The Nebraska Department of Health and Human Services follows the applicable centralized guidance and policies provided by the Nebraska Department of Administrative Services (NDAS). The NDAS has 12 divisions, including Accounting and Budget, that provides services to other State agencies. The NDHHS has a Financial Services Division that provides support services to the department through budget development and monitoring, State and Federal report compilation, audit coordination, accounting transactions, grant and contract support, financial and program analysis, among others. The Grants and Cost Management Unit of the Financial Services Division provides technical assistance and support to NDHHS program offices related to Federal grants and programs. Functions of the Grants Unit include the following: (1) enter grant awards into the Grants accounting schedule of the State accounting system, (2) prepare financial reports for NDHHS Federal grants, (3) receive, review, and maintain audits of sub-grant units, (4) review and negotiate indirect cost rates with sub-grant units, and (5) provide financial advice related to grant programs.

State Statute 81-1111 requires that documents with amounts equal to or greater than \$1,500 or with “sensitive” coding be pre-audited. “Sensitive” items include salaries and benefits, program service expenses, and travel expenses. The pre-audit is a three-step process: 1st person collects the necessary support and enters the document in the Nebraska Information System; 2nd person reviews and approves the document on-line; and 3rd person (usually called the pre-auditor) ensures that the document meet statutory requirements, State Accounting Policies, agency policies, and posts the document on NIS. Pre-audit certification is subject to suspension and revocation by State Accounting, which provides the training and certification.

OCS reviewers examined the State’s general ledger detail reports and a sample of support documents such as timesheets and expense reimbursements, as well as disbursements of CSBG funds to eligible entities. The State operates on a cost-reimbursement basis with the eligible entities. The State’s administrative costs include salaries, benefits, travel, and training expenses for a full-time CSBG coordinator.

In accordance with Section 678D, States that receive funds shall make appropriate books, documents, papers, and records available to the Secretary and the Comptroller General of the United States, or any of their duly authorized representatives, for examination, copying, or mechanical reproduction on or off the premises of the appropriate entity upon a reasonable request for the item(s). NDHHS provided all requested information. OCS reviewers determined that the State is in compliance with Section 678D of the CSBG statute.

According to 45 CFR §92.20 (b)(6), accounting records must be supported by such source documentation as cancelled checks, paid bills, payrolls, time and attendance records, contract and subcontract award documents. NDHHS provided all requested information. OCS reviewers determined the State is in compliance with 45 CFR §92.20.

OCS reviewers examined the State’s internal audit process. State auditors are required to examine all State funding made to the eligible entities dating back to the previous State audit. Any audit finding(s) are reported to the CAA Executive Director and Board of Directors. The CAA Board of Directors are required to respond to the notification letter within 30 days with a written Corrective Action Plan (CAP) that addresses the findings. Audit Office staff must review and approve the CAP. The CAA’s failure to respond within the allotted time frame may result in disciplinary actions being taken by the State, 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 the State on a case-by-case basis for eligible entities with audit findings. The OCS reviewers had no findings for technical assistance.

OMB Circular A-133, Single Audit Act of 1997

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

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

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

The Nebraska Auditor of Public Accounts has completed their most current audit of selected accounts included on the financial statements of the State ending June 30, 2007. 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 determined during the on-site assessment that the State does not have written policies and procedures to address audit findings.

OCS reviewers examined the FAC Data Collection Form for reporting on Audits of States, Local Governments, and Non-Profit Organizations found on the FAC website. The OCS reviewers found the State forms were written and submitted in accordance with the Federal requirements. The State Auditor found no areas of noncompliance, reportable conditions, including material weaknesses, questioned costs, fraud, or other reportable items for CSBG. OCS reviewers also recognize that the State adheres to the accounting principles and financial reporting standards established by the Governmental Accounting Standards Board.³

Recapture and Redistribution

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

Carryover Balance

In accordance with 45 CFR §92.40, §92.41, and §96.30(b)(4), respectively, the grantee shall submit annual program progress and financial status reports using OMB Standard Form 269A Financial Status Report (short form). The Financial Status Reports (FSRs) are due within 90 days of the close of the applicable statutory grant periods. The Nebraska FSRs were due December 30, 2006 and December 30, 2007. Failure to submit reports on time may be the basis for withholding financial

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

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

Grantees are required to adhere to a provision of the law under the Consolidated Appropriations Act of 2005, which requires that to the extent FY 2006 CSBG funds are distributed by a State to an eligible entity and have not been expended by such eligible entity, they shall remain with such eligible entity for carryover and expenditure into the next fiscal year.

The State reported a carryover balance of \$354,869 for FY 2006, which was expended in FY 2007. Nebraska's policy on carryover funds states that eligible entities shall retain any carryover to the next program year. When the agency has determined that it will not utilize all of the current program year funds, it will notify the State, which will re-contract the carryover funds.

Public Hearings

According to Section 676(a)(2)(B), at the beginning of each fiscal year, a State must prepare and submit a State Application and Plan covering a period of one year and no more than two fiscal years. Each year the State CSBG Plan is sent to the CSBG Advisory Committee, the State General Assembly, and all eligible entities. In conjunction with the development of the State Plan, the State holds at least one public hearing. The CSBG Public Hearing was held on Thursday, August 5, 2004 at 10:00 a.m. in Lower Level Conference Room D at the State Office Building, 301 Centennial Mall South, Lincoln, Nebraska 68509. A public notice advertisement was placed in the Omaha World-Herald, which has statewide distribution, stating that a CSBG Public Hearing will be held to accept comments on the proposed plan and that copies of the proposed plan will be available at the Office of Economic and Family Support Services, 4th Floor, State Office Building and the NDHHS website. OCS reviewers assessed the State Public Hearing procedures and determined that the State was in compliance with the CSBG statute.

Tripartite Boards

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

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

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

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

In accordance with Federal and State laws, 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 is required to monitor board composition and follow-up with the CAAs when representation needs to be adjusted. The State assured OCS that the CAAs adhere to the statute regarding Tripartite Boards by providing information regarding the requirements of a Tripartite Board to each eligible entity in three documents: CSBG Operations Manual, CSBG Grant Agreement, CSBG assurances submitted with the State Plan each year.

OCS reviewers examined the monitoring reports and attached documentation for several eligible entities and determined that the State demonstrated reasonable internal controls for monitoring and approving Tripartite Board certifications.

Additional Administrative or Fiscal Operations Findings

The State is required to maintain a current financial procedure manual in order to meet fiscal standards set forth by Federal regulations. Financial reports are required monthly. Quarterly financial reports are due within 30 days of the end of each quarter and annual fiscal reports are required at the end of the State's fiscal year. The annual on-site compliance review conducted by the State should determine compliance to specific areas including financial compliance. Failure to comply with State and Federal reporting requirements may result in corrective action including suspension of grant awards. OCS reviewers noted in the interview that the State did not have policies and procedures in place for designation and redesignation.

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

According to CSBG statute, the State is required to have processes in place to provide oversight of CSBG funds. The OCS reviewers' analyses of the State's records and procedures that included administrative, financial, and programmatic operations, determined that the State demonstrated

reasonable internal controls to administer the CSBG Program. OCS reviewers conducted an analysis of the State's records and procedures, which included administrative, financial, and programmatic operations and determined that the State's written policies and procedures are in compliance with the CSBG statute.

Program Operations

The State reported demographic information on individuals who received services using CSBG funds in FY 2006. 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 addressed the following areas: client services received, expenditures, staff responsibility, board governance, bylaws, board meeting minutes, board manual, personnel, planning and operations, CSBG assurances, fiscal operations, Training and Technical Assistance (T&TA) grants, T&TA grant reviews, and agency postings (i.e., worker's compensation, client appeals, etc.).

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

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

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

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

- A community needs assessment;
- A description of the service delivery system for low-income individuals and families in the service area;
- A description of linkages that will be developed to fill gaps in 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 Nebraska community revitalization. The CSBG Client Characteristics and Statistics reported by State are found in Table 3 on the next page:

Table 3

| CSBG Client Characteristics and Statistics Reported by State | |
|---|--------|
| Race/Ethnicity by Number of Persons: | |
| Hispanic or Latino | 18,030 |
| African-American | 3,127 |
| White | 67,781 |
| Other | 9,840 |
| Multi-race | 6,047 |
| Education: Years of Schooling by Number of Persons: | |
| 0-8 years | 3,964 |
| 9-12 years, non graduates | 14,446 |
| High school graduates/GED | 21,123 |
| 12+ years, some postsecondary | 4,338 |
| 2 or 4 years, college graduates | 2,669 |
| Insured/Disabled: | |
| No Health Insurance | 21,252 |
| Disabled | 9,869 |
| Surveyed About Insurance | 54,764 |
| Surveyed About Disability | 53,711 |
| Family Structure: | |
| Female Single Parent | 10,531 |
| Male Single Parent | 545 |
| Two-Parent Household | 8,748 |
| Single Person | 12,976 |
| Two Adults, No Children | 4,360 |
| Family Housing by Number of Families: | |
| Own | 11,089 |
| Rent | 22,008 |
| Homeless | 1,413 |
| Level of Family Income as Percentage of Federal Poverty Guideline by Number of Families: | |
| Up to 50% | 9,066 |
| 51% to 75% | 5,361 |
| 76% to 100% | 9,055 |
| 101% to 125% | 5,587 |
| 126% to 150% | 1,942 |
| 151% or more | 3,475 |

The program activities associated with CSBG funds as used by the CAAs in Nebraska for FY 2006 are detailed below.

Employment Programs

The State reported spending \$304,736 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 Temporary Assistance for Needy Families (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 support services such as transportation, child care, and the purchase of uniforms or work clothing;
- Skills training, job application assistance, resume writing, and job placement;
- On-the-job training and opportunities for work;
- Job development including finding employers willing to recruit through the agency, facilitating interviews, creating job banks, providing counseling to employees, and developing new employment opportunities in the community;
- Vocational training for high school students and the creation of internships and summer jobs; and
- Other specialized adult employment training.

Education Programs

The State reported spending \$301,544 in CSBG funds to provide education services. These services may include:

- Adult education, including courses in English as a 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 \$164,077 in CSBG funds to provide housing programs to improve the living environment of low-income individuals and families. These services may include:

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

Emergency Services Programs

The State reported spending \$384,477 for emergency services and crisis intervention. These services may include:

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

Nutrition Programs

The State reported spending \$311,605 in CSBG funds to support nutrition programs. These services may include:

- Organizing and operating food banks;
- Supporting food banks of faith-based and civic organization partners with food supplies and/or management support;
- Counseling 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;
- 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 infant nutrition, diets, and available Federal or State programs.

Self-Sufficiency Programs

The State reported spending \$820,978 in CSBG funds on self-sufficiency services to assist families in becoming more financially independent. These services may include:

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

Health Programs

The State reported spending \$252,332 in CSBG-funds for health initiatives, which includes addressing gaps in the care and coverage available in the community. These services may include:

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

Income Management Programs

The State reported spending \$283,718 in CSBG funds on income management programs. These services may include:

- Development of household assets, including savings;
- Assistance with budgeting techniques;
- Consumer credit counseling;
- Business development support;
- Homeownership assistance;
- Energy conservation and energy consumer education programs including weatherization;
- Tax counseling and tax preparation assistance; and
- Assistance for the elderly with claims for medical and other benefits.

Linkages

The State reported spending \$946,533 in CSBG funds on linkage initiatives. These services may include:

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

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

Programs for Youth and Seniors

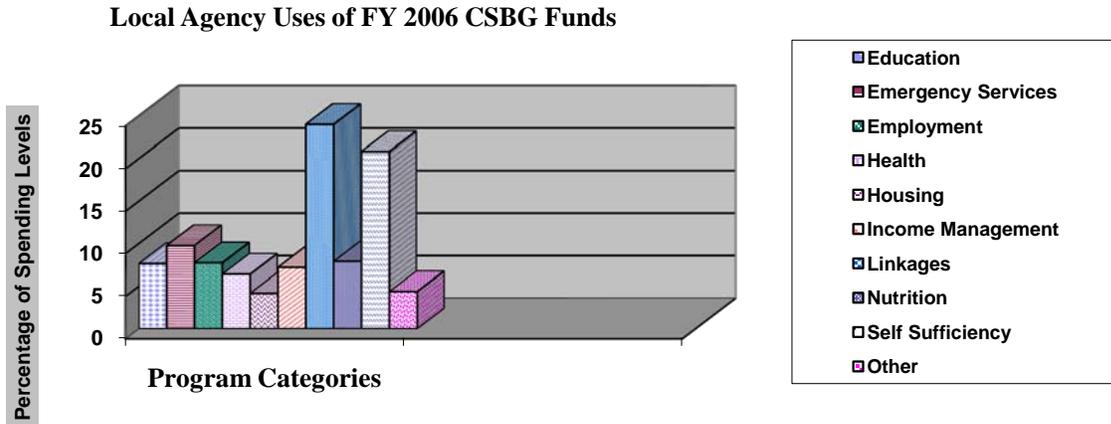
The State reported spending \$322,336 on the programs serving youth and spending \$369,584 in CSBG funds on programs serving seniors. Services noted under these categories were targeted exclusively to children and youth from ages 6 – 17 or persons over 55 years of age. Seniors' programs help seniors avoid or address illness, incapacity, absence of a caretaker or relative, prevent abuse and neglect and promote wellness. These services may include:

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



Results Oriented Management and Accountability (ROMA) Performance Measurement 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 (ROMA). Alternatively, States may design their own similar system. States are to report to OCS their progress on the implementation of performance measurement practices.

The Nebraska CSBG Manual outlines the Accountability and Reporting requirements for its eligible entities. According to Nebraska policies, all eligible entities are required to participate in a performance measure system which satisfies the CSBG statute. ROMA data is collected through the Service Point case management software system that is used by Nebraska’s eligible entities. ROMA training is provided through the NASCSP conferences on the State level and through the local CAP conferences held for Nebraska eligible entities.

The State did not provide demographic information for the number of program participants surveyed who were without health insurance or disabled.

III. Community Action Agencies (CAAs) On-site Review Summaries

Blue Valley Community Action Partnership (BVCAP)

BVCAP is a Nebraska based 501(c)(3) private, non-profit organization which administers programs that address housing, economic development, employment, homelessness, energy assistance, education and child development, health and nutrition, mediation, elder services, and emergency response services. In 2006, BVCAP provided assistance to 13,811 residents representing more than 6,331 households and had an annual budget of \$11,287,035 of which \$266,433 were CSBG funds. BVCAP has 23 locations within the nine county service areas including two in Kansas. BVCAP started or helped start several initiatives including the only full Workforce Investment One Stop Center within the nine counties, the first rural transportation system in the state, domestic violence and mediation service, homeless prevention programs for adults, and a youth center for disadvantaged children ages 6-16, who are either homeless or having difficulties in school.

Eastern Nebraska Community Action Partnership (ENCAP)

ENCAP is a Nebraska based 501(c)(3) private, non-profit organization established with the purpose of working with low-income families and the elderly in Douglas and Sarpy counties, specifically to provide assistance in their efforts to become or remain fiscally and socially independent. ENCAP administers programs addressing housing/homelessness, energy assistance, nutrition and hunger prevention, child development, elder services, employment, education, training, gang prevention, domestic violence, emergency services, and behavioral health services. Through its Behavioral Services Department, ENCAP contracted with the Omaha Public Schools to provide group therapy sessions for youth in the Alternative School Program. In 2006, ENCAP provided assistance to 5,649 residents representing more than 900 households and had an annual budget of \$1,817,003 of which \$1,006,949 were CSBG funds. ENCAP has helped thousands of low-income residents over the past 40 years and is dedicated to continuing to fulfill the Promise of Community Action by being a strong voice for those in need and assisting individuals to overcome obstacles and barriers to their success.

Lincoln Action Program (LAP)

LAP is a private, non-profit Community Action Agency dedicated to improving the lives of individuals and families with low incomes in Lancaster and Saunders Counties. With more than 20 programs, LAP provides a continuum of services for its clients. Programs are designed to meet the needs of people from infants to seniors. Programs offered by LAP include the Center for Refugees, Housing and Resources Counseling, Supportive Housing, Residential Energy Assistance, Homeless Voucher Program, Educational Outreach, and Entrepreneur Development. In 2006, LAP provided assistance to 5,222 residents representing more than 1,627 households and had an annual budget of \$12,092,196 of which \$548,597 were CSBG funds. LAP delivers strength-based and outcome-based services and builds on skills of individuals and families served in order to effectively identify and address the challenges they face.

IV. Assessment Findings and Recommendations

OCS conducted a review of the State policies and procedures, documentation, Terms and Conditions of the CSBG grant, and other applicable policies. The State utilizes a comprehensive monitoring tool and maintains a monitoring schedule that assures all eligible entities are monitored for compliance with State and Federal statutes. The State's internal controls for eligible entities are mandated by the Nebraska CSBG Manual. Through a review of the accounting procedures, OCS reviewers determined that the State adheres to the accounting principles and financial reporting standards established by the Governmental Accounting Standards Board. Overall, the State demonstrated reasonable and responsible internal controls for the administration of the CSBG Program. OCS reviewers determined that the State was in compliance with CSBG statute, however, OCS reviewers noted one finding and recommendation for the State:

Finding 1

The State does not have written policies and procedures to address corrective action processes for audit report findings.

Recommendation

1.1 OCS recommends the State develop and implement written policies and procedures for corrective action(s) to ensure that audit findings are incorporated into its decision-making process and the State is in compliance with CSBG Statue and OMB Circular A-133.

State Comments:

The State of Nebraska will act on recommendation 1.1 and develop and implement written program policies and procedures specific to the Community Services Block Grant by September 2010. It will outline the Monitoring and Corrective Actions set out in Sec. 678B Monitoring of Eligible Entities and Sec 678C Corrective Action: Termination and Reduction of Funding of the CSBG Act for subgrantee agencies when they have an audit finding. The State of Nebraska will also incorporate Sec. 678D Fiscal Controls, Audits and Withholding specifically 678D(2)A-C that addresses audits and the Single Audit Requirements relating to the state's yearly audit. The State of Nebraska will also include language from the OMB Circular A-133 Compliance Supplement Addendum #1 issued on June 30, 2009. Specifically, it will include the language under Suggested Audit Procedures- Compliance 1-4 found on page 3-A-2.

The State of Nebraska has followed the procedures set out in OMB Circular A-133 and the CSBG Act concerning corrective action processes for audit report findings both on the state level and the subgrantee level. Attached are the written policies concerning A-133 compliance and audit requirements. Included is the audit certification form that is required of all subgrants. As shown in the attached document, the written policies give program managers a place to look at the log of audits and also a contact person should there be questions concerning the subgrantee audit findings.

OCS Comment:

OCS concurs with the newly implemented procedures. During the corrective action phase, OCS will also monitor the State's progress in reviewing the sub-recipients single audits compliance requirements in accordance with CSBG statute, 45 CFR §96.31, and OMB Circular A-133.

The State should consider this report final. If you have any questions or comments, please contact:

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