

CSBG State Plan

Program Name: Community Services Block Grant

Grantee Name: NEBRASKA DEPARTMENT OF HEALTH & HUMAN SERVICES

Report Name: CSBG State Plan

Report Period: 10/01/2024 to 09/30/2025


Report Status: Submitted

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CSBG Cover Page (SF-424M)

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES Administration for Children and Families Community Services Block Grant (CSBG)		Form Approved OMB No: 0970-0382 Expires: 09/30/2025	
COVER PAGE			
* 1.a. Type of Submission: <input type="radio"/> Application <input checked="" type="radio"/> Plan <input type="radio"/> Other (2 Year)	* 1.b. Frequency: <input type="radio"/> Annual <input checked="" type="radio"/> Other (2 Year)	* 1.c. Consolidated Application/ Plan/Funding Request? Explanation: 2. Date Received: 3. Applicant Identifier: 4a. Federal Entity Identifier: 4b. Federal Award Identifier:	* 1.d. Version: <input checked="" type="radio"/> Initial <input type="radio"/> Resubmission <input type="radio"/> Revision <input type="radio"/> Update State Use Only: 5. Date Received By State: 6. State Application Identifier:
7. APPLICANT INFORMATION			
* a. Legal Name: Nebraska Department of Health and Human Services			
* b. Employer/Taxpayer Identification Number (EIN/TIN): 1470491233B2		* c. Organizational DUNS: 208819957	
* d. Address:			
* Street 1:	301 Centennial Mall South	* Street 2:	
* City:	Lincoln	* County:	Lancaster
* State:	NE	* Province:	
* Country:	United States	* Zip / Postal Code:	68509-5026
e. Organizational Unit:			
Department Name: Nebraska Department of Health and Human Services		Division Name: Office of Economic Assistance (OEA)	
f. Name and contact information of person to be contacted on matters involving this application:			
Prefix:	* First Name: Shannon	Middle Name:	* Last Name: Grotrian
Suffix:	Title: Director of OEA	Organizational Affiliation:	
* Telephone Number: (402) 471-2738	Fax Number:	* Email: Shannon.Grotrian@nebraska.gov	
* 8a. TYPE OF APPLICANT: A: State Government			
b. Additional Description:			
* 9. Name of Federal Agency:			
		Catalog of Federal Domestic Assistance Number:	CFDA Title:
10. CFDA Numbers and Titles			
11. Descriptive Title of Applicant's Project Community Services Block Grant State Plan for FFY 2025 and FFY 2026			
12. Areas Affected by Funding: Statewide			
13. CONGRESSIONAL DISTRICTS OF:			
* a. Applicant 2		b. Program/Project: Statewide	
Attach an additional list of Program/Project Congressional Districts if needed.			
14. FUNDING PERIOD:		15. ESTIMATED FUNDING:	
a. Start Date:	b. End Date:	* a. Federal (\$): \$0	b. Match (\$): \$0
* 16. IS SUBMISSION SUBJECT TO REVIEW BY STATE UNDER EXECUTIVE ORDER 12372 PROCESS?			
a. This submission was made available to the State under the Executive Order 12372			
Process for Review on :			

b. Program is subject to E.O. 12372 but has not been selected by State for review.	
c. Program is not covered by E.O. 12372.	
* 17. Is The Applicant Delinquent On Any Federal Debt? <input type="radio"/> YES <input checked="" type="radio"/> NO	
Explanation:	
18. By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001) **I Agree <input checked="" type="checkbox"/>	
** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.	
18a. Typed or Printed Name and Title of Authorized Certifying Official	18c. Telephone (area code, number and extension)
	18d. Email Address
18b. Signature of Authorized Certifying Official 	18e. Date Report Submitted (Month, Day, Year) 08/22/2024
Attach supporting documents as specified in agency instructions.	

Section 1: CSBG Lead Agency, CSBG Authorized Official, CSBG Point of Contact, and Official State Designation Letter

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES Administration for Children and Families Community Services Block Grant (CSBG)		Form Approved OMB No:0970-0382 Expires:09/30/2025	
SECTION 1 CSBG Lead Agency, CSBG Authorized Official, CSBG Point of Contact, and Official State Designation Letter			
1.1. Identify whether this is a One-Year or a Two-Year Plan		<input type="radio"/> one-year <input checked="" type="radio"/> two-year	
1.1a. Provide the federal fiscal years this plan covers:		Year One 2025	Year Two 2026
1.2. Lead Agency and Authorized Official: Update the following information in relation to the lead agency and authorized official designated to administer CSBG in the state, as required by Section 676(a) of the CSBG Act. <i>Information should reflect the responses provided in the Application for Federal Assistance, SF-424M.</i>			
Has information regarding the state lead agency and authorized official changed since the last submission of the State Plan? <input checked="" type="radio"/> Yes <input type="radio"/> No			
If yes, select the fields that have been changed [Check all that apply]			
<input type="checkbox"/>	Lead Agency	<input checked="" type="checkbox"/>	Department Type
<input checked="" type="checkbox"/>	Authorized Official	<input type="checkbox"/>	Street Address
<input type="checkbox"/>	Zip Code	<input checked="" type="checkbox"/>	Office Number
<input checked="" type="checkbox"/>	Email Address	<input type="checkbox"/>	Fax Number
1.2a. Lead agency		State of Nebraska	
1.2b. Cabinet or administrative department of this lead agency [Check one and provide a narrative where applicable]			
<input type="radio"/> Community Affairs Department			
<input type="radio"/> Community Services Department			
<input type="radio"/> Governors Office			
<input type="radio"/> Health Department			
<input type="radio"/> Housing Department			
<input checked="" type="radio"/> Human Services Department			
<input type="radio"/> Social Services Department			
<input type="radio"/> Other, describe			
1.2c. Cabinet or Administrative Department Name: Provide the name of the cabinet or administrative department of the CSBG authorized official		Nebraska Department of Health and Human Services, Office of Economic Assistance (NE-DHHS-OEA)	
1.2d. Authorized Official of the Lead Agency			
Name: Shannon Grotrian		Title: Director of the Office of Economic Assistance	
1.2e. Street Address		301 Centennial Mall South, P.O. Box 95026	
1.2f. City		Lincoln	1.2g. State NE
1.2i. Telephone number 402 471 - 2738 ext.		1.2j. Fax number -	
1.2k. Email address Shannon.Grotrian@nebraska.gov		1.2l. Lead agency website https://dhhs.ne.gov	
1.3. Designation Letter: Attach the state's official CSBG designation letter. A new designation letter is required if the chief executive officer of the state and/or the designated agency has changed.			
1.4. CSBG Point of Contact: provide the following information in relation to the designated state CSBG point of contact. The state CSBG point of contact should be the person that will be the main point of contact for CSBG within the state.			
Has Information regarding to the state point of contact has changed since the last submission of the State Plan? <input checked="" type="radio"/> Yes <input type="radio"/> No			

If yes, select the fields that have changed [check all the apply]					
<input checked="" type="checkbox"/>	Agency Name	<input type="checkbox"/>	Point of Contact	<input type="checkbox"/>	Street Address
<input type="checkbox"/>	City	<input type="checkbox"/>	Zip Code	<input type="checkbox"/>	Office Number
<input type="checkbox"/>	Fax Number	<input type="checkbox"/>	Email Address	<input type="checkbox"/>	Website
1.4a. Agency Name Office of Economic Assistance					
1.4b Point of Contact Name					
Name: Matt Thomsen			Title: Community Based Programs Administrator		
1.4c. Street Address			1955 E. Military Avenue		
1.4d. City			Fremont	1.4e. StateNE	1.4f. Zip 68025
1.4g. Telephone Number 402 417 - 9435 ext.			1.4h. Fax Number -		
1.4i. Email Address Matt.Thomsen@nebraska.gov			1.4j. Agency Website https://dhhs.ne.gov		
1.5. Provide the following information in relation to theState Community Action Association.					
There is currently a state Community Action Association within the state. <input checked="" type="radio"/> Yes <input type="radio"/> No					
Has Information regarding the state Community Action Association has changed since the last submission of the State Plan? <input type="radio"/> Yes <input checked="" type="radio"/> No					
If yes, select the fields that have been changed [Check all the apply]					
<input type="checkbox"/>	Agency Name	<input type="checkbox"/>	Executive Director	<input type="checkbox"/>	Street Address
<input type="checkbox"/>	City	<input type="checkbox"/>	State	<input type="checkbox"/>	Zip Code
<input type="checkbox"/>	Office Number	<input type="checkbox"/>	Fax Number	<input type="checkbox"/>	Email Address
<input type="checkbox"/>	Website	<input type="checkbox"/>	RPIC Lead		
1.5a. Agency Name Community Action of Nebraska					
1.5b. Executive Director or Point of Contact					
Name: Tina Rockenbach			Title: Executive Director		
1.5c. Street Address			211 N. 14th Street		
1.5d. City			Lincoln	1.5e. StateNE	1.5f. Zip 68508
1.5g. Telephone number 402 471 - 3714 ext. 1			1.5h. Fax number -		
1.5i. Email Address director@canhelp.org			1.5j. State Association Website www.canhelp.org		
1.5k. State Association currently serves as the Regional Performance Innovation Consortia (RPIC) lead <input type="radio"/> Yes <input checked="" type="radio"/> No					

Section 2: State Legislation and Regulation

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
Administration for Children and Families
Community Services Block Grant (CSBG)

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SECTION 2 State Legislation and Regulation

2.1. CSBG State Legislation:

State has a statute authorizing CSBG ☐ Yes ☒ No

2.2. CSBG State Regulation:

State has regulations for CSBG ☒ Yes ☐ No

2.3. Legislation/Regulation Document: *Attach the legislation and/or regulations or provide a hyperlink(s) to the documents indicated under Item 2.1. and/or Item 2.2.*

<https://rules.nebraska.gov>

2.4. State Authority:

Select a response for each of the following items about the state statute and/or regulations authorizing CSBG:

2.4a. Authorizing Legislation: State legislature enacts authorizing legislation or amendments to an existing authorizing statute, last federal fiscal year ☐ Yes ☒ No

2.4b. Regulation Amendments: State established or amended regulations for CSBG last federal fiscal year ☐ Yes ☒ No

Section 3: State Plan Development and Statewide Goals

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SECTION 3

State Plan Development and Statewide Goals

3.1. CSBG Lead Agency Mission and Responsibilities:

Briefly describe the mission and responsibilities of the state agency that serves as the CSBG Lead Agency.

The mission of the Nebraska Department of Health and Human Services (NE DHHS) is Helping People Live Better Lives. NE DHHS includes the Divisions of Behavioral Health, Children and Family Services, Developmental Disabilities, Medicaid and Long-Term Care, Public Health, and the Office of Economic Assistance (OEA). The Community Services Block Grant (CSBG) program is within OEA. OEAs vision statement is to foster self-sufficiency with dignity, resilience, and prosperity through comprehensive support and to promote long-term well-being and economic stability for all Nebraskans. The OEA mission statement is to commit to empowering individuals on their journey to self-sufficiency through comprehensive support and resources. OEA aims to promote long-term economic stability for Nebraskans, foster resilience, and ensure access to resources for those in need, reducing poverty and creating thriving communities.

3.2. State Plan Goals:

Describe the state's CSBG-specific goals for state administration of CSBG under this State Plan.

(Note: This information is associated with State Accountability Measure 1Sa(i) and pre-populates the State's Annual Report, Module 1, Item B.1.)

Eligible Entity Specific: 1. The eligible entities will participate and be engaged in the training and technical assistance opportunities provided. 2. The eligible entities will ensure services/activities address identified needs/service gaps in their areas. 3. Improve data and ROMA implementation across all nine (9) eligible entities with the assistance of the System Administrator at the Community Action of Nebraska (CAN). 4. All nine eligible entities will meet 93% of the Organizational Standards during Federal Fiscal Years (FFY) 2025 and 2026. 5. The eligible entities will partner with other agencies/organizations in their service areas to ensure the needs of low-income individuals are met. State Specific: 1. The Nebraska State CSBG Office will develop a partner website for the eligible entities to submit documents securely to the Nebraska State CSBG Office. 2. The Nebraska State CSBG Office will improve upon the monitoring processes. 3. The eligible entities will be supported regarding data analysis and ROMA implementation. 4. The Nebraska State CSBG Office will support and share information with eligible entities regarding the network and connect eligible entities to information regarding other government and community programs. 5. The Nebraska State CSBG Office will ensure training and technical assistance are provided to meet the needs of the eligible entities and network. 6. The Nebraska State CSBG Office will award funds to the eligible entities within 30 days of receipt of the notice of award.

3.3. State Plan Development:

Indicate the information and input the state accessed to develop this State Plan.

3.3a. Analysis of state-level tools *[Check all that apply applies and provide additional information where applicable]*

☒ State Performance Indicators and/or National Performance Indicators (NPIs)

☐ U.S. Census data

☒ State Performance Management Data (e.g., accountability measures, ACSI survey information, and/or other information from annual reports)

☒ Monitoring Visits/Assessments

☐ Tools Not Identified Above (specify)

3.3b. Analysis of local-level tools *[Check all that applies and provide additional information where applicable]*

☒ Eligible Entity Community Needs Assessments

☒ Eligible Entity Community Action Plans

☒ Public Hearings/Workshops

☒ Tools Not Identified Above (e.g., State required reports) [specify]

Information from the organizational standards review and the monthly executive director/chief executive officer calls were utilized.

3.3c. Consultation with *[Check all that applies applies and provide additional information where applicable]*

☒ Eligible Entities (e.g., meetings, conferences, webinars; not including the public hearing)

☒ State Association

☒ National Association for State Community Services Programs (NASCSPP)

☐ Community Action Partnership (NCAP)

☐ Community Action Program Legal Services (CAPLAW)

☐ CSBG Tribal Training and Technical Assistance (T/TA) provider

☒ Regional Performance Innovation Consortium (RPIC)

☐ Association for Nationally Certified ROMA Trainers (ANCRT)

<input checked="checked" type="checkbox"/> Federal CSBG Office				
<input type="checkbox"/> Organizations not identified above [Specify]				
3.4. Eligible Entity Involvement				
3.4a. State Plan Development Describe the specific steps the State took in developing the State Plan to involve the eligible entities.				
<i>(Note: This information is associated with State Accountability Measures 1Sa(ii) and may pre-populate the State's annual report form)</i>				
<p>On January 10, 2024, the Nebraska State CSBG Office met in person with all nine (9) eligible entities and the state association to review the current state plan and discuss revisions for the future. The Nebraska State CSBG Office meets with the executive directors/chief executive officers of the eligible entities regularly to provide updates and obtain feedback throughout the year. Additionally, the Nebraska State CSBG Office meets with the state association monthly to provide updates, obtain feedback, etc. The Nebraska State CSBG Office drafted the CSBG State Plan after receiving input from the eligible entities and state association. The drafted plan was posted for thirty (30) days for public comment and a public hearing was held to allow the eligible entities, state association, other agencies, and the public to provide any additional comments.</p>				
3.4b. Performance Management Adjustment: Describe how the state adjusted its State Plan development procedures under this State Plan, as compared to previous State Plans, in order to:				
1) encourage eligible entity participation and 2) ensure the State Plan reflects input from eligible entities?				
<p>Any adjustment should be based on the State's analysis of past performance in these areas, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the State is not making any adjustments, provide further detail.</p>				
<i>(Note: This information is associated with State Accountability Measures 1Sb(i) and (ii) and pre-populate the Annual Report, Module 1, Item B.1.)</i>				
<p>According to the ACSI survey results, received May 27, 2021, the Nebraska Development of CSBG State Plan score raised twenty-one (21) points from the 2019 ACSI survey results. This was in part due to the Nebraska State CSBG Office working to increase communication between the eligible entities, the Nebraska State CSBG Office, and the state association in the state planning process. When completing the FFY 2025-2026 CSBG State Plan, the Nebraska State CSBG Office utilized a process that was similar to the process for the prior state plan. The Nebraska State CSBG Office released a survey in December 2023 to identify days and times for the eligible entities and state association to meet with the Nebraska State CSBG Office to discuss the FFY 2025-2026 CSBG State Plan. The Nebraska State CSBG Office met with the eligible entities and CAN (state association) in January 2024 to review the current state plan and plan for future revisions. The Nebraska State CSBG Office increased engagement with national and federal partners to obtain guidance, which was shared with the entire CSBG network. The Nebraska State CSBG Office prioritized increasing the participation from all nine (9) eligible entities to ensure the state plan reflects eligible entity input.</p>				
3.5. Eligible Entity Overall Satisfaction: Provide the State's target for eligible entity Overall Satisfaction during the performance period:				
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; padding: 5px;">Year One</td> <td style="width: 50%; padding: 5px; text-align: center;">73</td> </tr> <tr> <td style="width: 50%; padding: 5px;">Year Two</td> <td style="width: 50%; padding: 5px; text-align: center;">73</td> </tr> </table>	Year One	73	Year Two	73
Year One	73			
Year Two	73			
<p>Instructional Note: The state's target score will indicate improvement or maintenance of the state's Overall Satisfaction score from the most recent American Customer Survey Index (ACSI) survey of the state's eligible entities.</p> <p><i>(Note: Item 3.5 is associated with State Accountability Measure 8S and may pre-populate the State's annual report form)</i></p>				

Section 4: CSBG Hearing Requirements

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
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SECTION 4 CSBG Hearing Requirements

4.1. Public Inspection:

Describe the steps taken by the state to disseminate this State Plan to the public for review and comments prior to the public hearing, as required under Section 676(e)(2) of the Act.

The Nebraska State CSBG Office began discussing the state plan with eligible entities and the state association in January 2024. The eligible entities and the state association received a copy of the state plan via email and were encouraged to share the information. The drafted CSBG FFY 2025-2026 State Plan and notice of the public hearing were posted on the NE DHHS website (dhhs.ne.gov) to allow for review and public comment. The public comment period was open for thirty (30) days. The Nebraska State CSBG Office distributed the public hearing notice to the two newspapers with the largest statewide distribution in Nebraska (the Omaha World-Herald and the Lincoln Journal Star), as well as directly by email to the eligible entities and the state association.

4.2. Public Notice/Hearing:

Describe how the state ensured there was sufficient time and statewide distribution of notice of the public hearing(s) to allow the public to comment on the State Plan, as required under Section 676(a)(2)(B) of the CSBG Act.

The Nebraska State CSBG Office began discussing the state plan with the eligible entities and the state association in January 2024. The Nebraska State CSBG Office emailed the drafted CSBG FFY 2025-2026 State Plan to all eligible entities and the state association for review. The Nebraska State CSBG Office posted the drafted state plan and notice of the public hearing on the NE DHHS website (dhhs.ne.gov). The Nebraska State CSBG Office submitted the public comment and public hearing notice to the two newspapers with the largest statewide distribution in Nebraska (the Omaha World-Herald and the Lincoln Journal Star), to the eligible entities, and the state association.

4.3. Public and Legislative Hearings:

In the table below, specify the date(s) and location(s) of the public and legislative hearing(s) held by the designated lead agency for this State Plan, as required under Section 676(a)(2)(B) and Section 676(a)(3) of the Act.

	Date	Location	Type of Hearing [Select an option]	If a combined hearing was held, confirm that the public was invited
1	04/11/2022	Nebraska State Capital (Lincoln, NE)	Legislative	<input type="checkbox"/>
2	08/14/2024	Nebraska State Office Building (Lincoln, NE)	Public	<input type="checkbox"/>

NOTE : States can add rows as needed for each hearing as needed

4.4. Attach supporting documentation or a hyperlink for the public and legislative hearings.

Section 5: CSBG Eligible Entities

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SECTION 5 CSBG Eligible Entities

5.1. CSBG Eligible Entities:

In the table below, indicate whether each eligible entity in the state, is public or private, the type(s) of entity, and the geographical area served by the entity.

Note: Table 5.1 pre-populates the Annual Report, Module 1, Table C.1.

Types of Entities include Community Action Agency, Limited Purpose Agency, Local Government Agency, Migrant or Seasonal Farmworker Organization, Tribe or Tribal Organization, and Other

#	CSBG Eligible Entity	Geographical Area Served by county (Provide all counties)	Public or Nonprofit	Type of Entity [choose all that apply]
1	Blue Valley Community Action, Inc.	Butler County, Fillmore County, Gage County, Jefferson County, Polk County, Saline County, Seward County, Thayer County, York County	Non-Profit	Community Action Agency
2	Community Action Partnership of Lancaster and Saunders Counties	Lancaster County, Saunders County	Non-Profit	Community Action Agency
3	Community Action Partnership of Western Nebraska	Scottsbluff County, Morrill County, Cheyenne County, Kimball County, Garden County, Banner County, Deuel County	Non-Profit	Community Action Agency
4	Central Nebraska Community Action Partnership, Inc	Boone County, Colfax County, Platte County, Boyd County, Holt County, Wheeler County, Brown County, Keya Paha County, Rock County, Hall County, Howard County, Hamilton County, Merrick County, Nance County, Blaine County, Custer County, Loup County, Sherman County, Valley County, Garfield County, Greeley County	Non-Profit	Community Action Agency
5	Eastern Nebraska Community Action Partnership	Douglas County, Sarpy County	Non-Profit	Community Action Agency
6	Community Action	Grant County, Hooker County, Thomas County, Arthur County, McPherson County, Logan County, Keith County, Lincoln County, Perkins County, Dawson County, Buffalo County, Chase County, Hayes County, Frontier County, Gosper County, Phelps County, Kearney County, Adams County, Clay County, Dundy County, Hitchcock County, Red Willow County, Furnas County, Harlan County, Franklin County, Webster County, Nuckolls County	Non-Profit	Community Action Agency
7	Northeast Nebraska Community Action Partnership, Inc.	Antelope County, Burt County, Cedar County, Cuming County, Dakota County, Dixon County, Dodge County, Knox County, Madison County, Pierce County, Stanton County, Thurston County, Washington County, Wayne County	Non-Profit	Community Action Agency
8	Northwest Community Action Partnership	Cherry County, Sheridan County, Box Butte County, Dawes County, Sioux County	Non-Profit	Community Action Agency
9	Southeast Nebraska Community Action Partnership, Inc.	Cass County, Otoe County, Johnson County, Nemaha County, Pawnee County, Richardson County	Non-Profit	Community Action Agency

5.2. Total number of CSBG eligible entities 9

5.3. Changes to Eligible Entities List:

Within the tables below, describe any changes that have occurred to the Eligible Entities within the state since the last federal fiscal Year (FFY), as applicable.

One or more of the following changes were made to the eligible entity list: [Check all that apply].

☐ Designation and/or Re-Designation

<input type="checkbox"/>	De-Designations and/or Voluntary Relinquishments
<input type="checkbox"/>	Mergers
<input checked="" type="checkbox"/>	No Changes to Eligible Entities List

5.3a. Designation and Re-Designation: Identify any new entities that have beendesignated as eligible entities, as defined under Section 676A of the Act, since the last federal fiscal year.Include any eligible entities designated to serve an area previously not served by CSBG as well as any entities designated to replace another eligible entity that was terminated (de-designated) or that voluntarily relinquished its status as a CSBG eligible entity.

CSBG Eligible Entity	Type	Start Date	Geographical Area Served	Delete
				X

5.3b. Designation and Voluntary Relinquishments: Identify any entities that are no longer receiving CSBG funding. Include any eligible entities that have been terminated (de-designated) as defined under Section 676(c) and Section 676C of the Act, or voluntarily relinquished their CSBG eligible entity status since the last Federal Fiscal Year (FFY). Include any eligible entities designated to serve an area previously not served by CSBG as well as any entities designated to replace another eligible entity that was terminated (de-designated)

CSBG Eligible Entity	Reason	Delete
		X

5.3c. Mergers: In the table below, provide information about any mergers or other combinations of two or more eligible entities that were individually listed in the prior State Plan.

Original CSBG Eligible Entities	Surviving CSBG Eligible Entity	New Name (as applicable)	DUNS No.	Delete
				X

Section 6: Organizational Standards for Eligible Entities

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SECTION 6 Organizational Standards for Eligible Entities

Note: Reference IM 138, *State Establishment of Organizational Standards for CSBG Eligible Entities*, for more information on Organizational Standards. Click [HERE](#) for IM 138.

6.1. Choice of Standards: Confirm whether the state will implement the CSBG Organizational Standards Center of Excellence (COE) organizational standards (as described in IM 138) or an alternative set during the federal fiscal year(s) of this planning period

☒ COE CSBG Organizational Standards ☐ Modified version of COE CSBG Organizational Standards ☐ Alternative set of Organizational Standards

6.1a. Modified Organizational Standards: In the case that the state is requesting to use modified COE-developed organizational standards, provide the proposed modification for the FFY of this planning period including the rationale.

6.1b. Alternative Organizational Standards: If using an alternative set of organizational standards, attach the complete list of alternative organizational standards.

6.1c. Alternative Organizational Standards Changes: If using an alternative set of organizational standards:

- 1) provide any changes from the last set provided during the previous State Plan submission;
- 2) describe the reasons for using alternative standards; and
- 3) describe how they are at least as rigorous as the COE- developed standards

☐ There were no changes from the previous State Plan submission

Provide reason for using alternative standards

Describe rigor compared to COE-developed Standards

6.2. Implementation: Check the box that best describes how the state officially adopt(ed) organizational standards for eligible entities in the state in a manner consistent with the state's administrative procedures act. If "Other" is selected, provide a timeline and additional information, as necessary. *[Check all that apply and narrative where applicable]*

☐ Regulation

☒ Policy

☒ Contracts with eligible entities

☐ Other, describe:

6.3. Organizational Standards Assessment: Describe how the state assess eligible entities against organizational standards this federal fiscal year(s). *[Check all that apply.]*

☐ Peer-to-peer review (*with validation by the State or state-authorized third party*)

☒ Self-assessment (*with validation by the State or state-authorized third party*)

☐ Self-assessment/peer review with state risk analysis

☐ State-authorized third party validation

☐ Regular, on-site CSBG monitoring

☐ Other

6.3a. Assessment Process: Describe the planned assessment process.

The Nebraska State CSBG Office plans to use the same process for assessment in the FFY 2025 and 2026. The Nebraska State CSBG Office will email the Organizational Standard Self-Assessment for Private CAAs Tool to all eligible entities with an identified deadline for completion. The Nebraska State CSBG Office will validate the results of the self-assessments of all nine (9) eligible entities with a sample selection process. This sample selection process will include the review of the standards the eligible entity self-selects as not met, the standards not met by the entity from the previous federal fiscal year, and the standards selected by the Nebraska State CSBG office. The standards selected for review by the Nebraska State CSBG Office will be based on any areas of needed improvement indicated by the network, guidance provided by federal partners, and issues identified by the Nebraska State CSBG Office. The Nebraska State CSBG Office will review at least twenty (20) total standards with at least one (1) standard from each category. After the Nebraska State CSBG Office validates the self-assessment (reviews the standards self-selected as not met by the entity, the standards not met the previous year, and the standards selected for review), the Nebraska State CSBG Office will conduct a conference call with each entity to review any issues identified. If any further documentation is required, the Nebraska State CSBG Office will establish a date by which the entities must submit the documentation to meet that standard. If an entity is not able to meet a standard by the established due date, the Nebraska State CSBG Office will develop a technical assistance plan (TAP) with that entity. TAPs will outline the unmet standard; documentation that is needed from the entity; action required by the entity; training and technical assistance (TTA) that the Nebraska State CSBG Office needs to provide; and establish deadlines. Organizational standards are maintained individually by the entities. Organizational standards not reviewed by the Nebraska State CSBG Office that are identified as met

by an entity are considered met. The Nebraska State CSBG Office determines the total percentage of standards met by dividing the number of met standards (including self-assessed standards) by the total number of standards. The entities organize supporting documentation for each standard on a flash drive, which is provided to the Nebraska State CSBG Office for review.

6.4. Eligible Entity Exemptions: Will the state make exceptions in applying the organizational standards for certain eligible entities due to special circumstances or organizational characteristics (as described in IM 138)? ☐ Yes ☒ No

6.4a. Provide the specific eligible entities the state will exempt from meeting organizational standards, and provide a description and a justification for each exemption

Total Number of Exempt Entities: 0

CSBG Eligible Entity	Description / Justification	Delete

6.5. Performance Target: Provide the percentage of eligible entities that the state expects to meet all the state-adopted organizational standards for FFY(S) for this planning period

Year One	93%	Year Two	93%
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Note: Item 6.5 is associated with State Accountability Measures 6Sa and prepopulate the Annual report, Module 1, Table D.2.

Section 7: State Use of Funds

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
Administration for Children and Families
Community Services Block Grant (CSBG)

Form Approved
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SECTION 7 State Use of Funds

Eligible Entity Allocation (90 Percent Funds) [Section 675C(a) of the CSBG Act]

7.1. Formula:

Select the method (formula) that best describes the current practice for allocating CSBG funds to eligible entities.

- ☐ Historic
- ☒ Base + Formula
- ☐ Formula Alone
- ☐ Formula with Variables
- ☐ Hold Harmless + Formula
- ☐ Other

7.1a. Formula Description: Describe the current practice for allocating CSBG funds to eligible entities.

From FFY 2013 through 2024, Nebraska allocated funds to each of the eligible entities based on a ratio established through a base plus formula. Following the receipt of the updated decennial census data, Nebraska began reviewing the base and formula. In FFY 2023, the Nebraska State CSBG Office contracted with the University of Nebraska Omaha to develop an updated formula with the new decennial census data. Additionally, in FFY 2023, the Nebraska State CSBG Office collaborated with the eligible entities and the state association to review available funding options; allocation requirements; and the new decennial census data. As a result, it was determined the 90% funding awarded to each agency for FFY 2025 and 2026 will be determined based on the ratio established from the following decennial census data factors: Each CAA will receive a base amount equal to 30% of the total CSBG award; and The remaining 70% will be distributed based on a formula in which the population in poverty is weighted at 54%, square miles of each eligible entity's service area is weighted at 4%, and a data index consisting of unemployment, housing burden, and people of color is weighted at 12%. This ratio will be used to determine the amount of the funding each agency will receive in future years and will be re-evaluated when decennial census data is updated.

7.1b. Statute: Does a state statutory or regulatory authority specify the formula for allocating "not less than 90 percent" funds among eligible entities? ☐ Yes ☒ No

7.2. Planned Allocation:

Specify the percentage of your CSBG planned allocation that will be funded to eligible entities and "not less than of 90 percent funds" as described under Section 675C(a) of the CSBG Act.

In the table, provide the planned allocation for each eligible entity receiving funds for the fiscal year(s) covered by this plan.

Note: This information pre-populates the state's Annual Report, Module 1, Table E.2.

Year One	90.00%	Year Two	90.00%
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Planned CSBG 90 Percent Funds

CSBG Eligible Entity	Year One Funding Amount \$	Delete
Blue Valley Community Action, Inc.	\$349,674	
Community Action Partnership of Lancaster and Saunders Counties	\$622,072	
Community Action Partnership of Western Nebraska	\$298,402	
Central Nebraska Community Action Partnership, Inc	\$539,564	
Eastern Nebraska Community Action Partnership	\$1,204,158	
Community Action	\$630,317	
Northeast Nebraska Community Action Partnership, Inc.	\$568,272	
Northwest Community Action Partnership	\$243,908	
Southeast Nebraska Community Action Partnership, Inc.	\$295,864	
Total	\$4,752,231	

CSBG Eligible Entity Year Two

CSBG Eligible Entity	Year Two Funding Amount \$	Delete
Blue Valley Community Action, Inc.	\$349,674	
Community Action Partnership of Lancaster and Saunders Counties	\$622,072	
Community Action Partnership of Western Nebraska	\$298,402	
Central Nebraska Community Action Partnership, Inc	\$539,564	
Eastern Nebraska Community Action Partnership	\$1,204,158	
Community Action	\$630,317	

Northeast Nebraska Community Action Partnership, Inc.	\$568,272
Northwest Community Action Partnership	\$243,908
Southeast Nebraska Community Action Partnership, Inc.	\$295,864
Total	\$4,752,231

7.3. Distribution Process:
Describe the specific steps in the state's process for distributing 90 percent funds to the eligible entities and include the number of days each step is expected to take; include information about state legislative approval or other types of administrative approval (such as approval by a board or commission).

Nebraska utilizes the following steps to distribute 90% funds to the eligible entities. Nebraska implemented a process in which the subawards (agreements) are executed prior to the receipt of the funds. This allows the administration, legal staff, procurement staff, and eligible entities to have adequate time to review and approve the agreement. Upon receipt of the Notice of Award, amendments are executed to award the funds to the eligible entities based on the already approved agreement. Additionally, all CSBG funding has been approved for priority processing to ensure the timely obligation of the funds to comply with the State Accountability Measures. The approval process requires the Nebraska State CSBG Office to submit a request in the online portal for the amendment to be created (approximately 1 day), the procurement and grants unit to create the amendments (approximately 10 days), the CSBG Program Specialist, the CSBG Program Administrator, the Deputy Director of Finance, the Deputy Director of Policy and Programs, and the Director of the Office of Economic Assistance (approximately 7 days). Next, the amendments are sent to the entities for electronic signature. Once returned, the Director of the Office of Economic Assistance reviews and electronically signs the amendments (approximately 7 days). The eligible entities can request reimbursement following the signing of the amendment. Payments are initiated by the Nebraska State CSBG Office through an automated system (OnBase). After a payment is entered and approved in OnBase, the payment must be approved by Support Services, Grants Management, and Accounting. Accounting notifies the Nebraska State CSBG Office when payments have been approved. Eligible entities receive the payment within two (2) to three (3) business days from the approval. Overall, payments are expected to be issued within approximately thirty (30) days of receipt of an accurate and complete reimbursement request.

7.3a Distribution Method: Select the option below that best describes the distribution method the state uses to issue CSBG funds to eligible entities:

☒ Reimbursement

☐ Advance

☐ Hybrid

☐ Other

7.4. Distribution Timeframe:
Does the state plan to make funds available to eligible entities no later than 30 calendar days after OCS distributes the federal award? ☒ Yes
☐ No

7.4a. Distribution Consistency: If no, describe state procedures to ensure funds are made available to eligible entities consistently and without interruption.

Note: Item 7.4 is associated with State Accountability Measure 2Sa and may prepopulate the state's annual report form.

7.5. Distribution of Funds Performance Management Adjustment:
Describe the state's strategy for improving grant and/or contract administration procedures under this State Plan as compared to past plans. Any improvements should be based on analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the state is not making any improvements, provide further detail.

Note: This information is associated with State Accountability Measure 2Sb and may prepopulate the state's annual report form.

The Nebraska State CSBG Office previously received approval for all CSBG funding updates to have priority processing. This assists the Nebraska State CSBG Office in obligating CSBG funding to the eligible entities in a timely manner. The Nebraska State CSBG Office is requiring Community Action Plans and annual budgets to be submitted for review and approval in April to allow the Nebraska State CSBG Office to execute all agreements prior to the beginning of the federal fiscal year and before federal funding is received. As a result, once funding is received, the funds are added to an already approved agreement via an amendment. This is a much quicker process than approving an entire agreement after the funds are received. Nebraska is utilizing a different system for the creation and tracking of agreements. Additionally, procurement/grants staff are creating the agreements based on information provided by program staff. This is anticipated to result in agreements with consistent language and in documents being created and approved more quickly.

Administrative Funds [Section 675C(b)(2) of the CSBG Act]

Note: This information pre-populates the state's Annual Report, Module 1, Table E.4.

7.6. Allocated Funds: Specify the percentage of your CSBG planned allocation for administrative activities for the FFY(s) covered by this State plan.

Year One (0.00%)	5.00	Year Two (0.00%)	5.00
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7.7. State Staff: Provide the number of state staff positions to be funded in whole or in part with CSBG funds for the FFY(s) covered by this State Plan

Year One	2.00	Year Two	2.00
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7.8. State FTEs: Provide the number of state Full Time Equivalents (FTEs) to be funded with CSBG funds for the FFY(s) covered by this State Plan

Year One	1.10	Year Two	1.10
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7.9. Remainder/Discretionary Funds Use: Does the state have remainder/discretionary funds, as described in Section 675C(b)(1) of the CSBG Act? ☒ Yes ☐ No

If yes, provide the allocated percentage and describe the use of the remainder/discretionary funds in the table below.			
Year One (0.00%)	5.00%	Year Two (0.00%)	5.00%
Use of Remainder/Discretionary Funds(See Section 675C(b)(1) of the CSBG Act)			
<i>Note: This response will link to the corresponding assurance, Item 14.2.</i>			
<p><i>If a funded activity fits under more than one category in the table, allocate the funds among the categories. For example, if the state provides funds under a contract with the State Community Action association to provide training and technical assistance to eligible entities and to create a statewide data system, the funds for that contract should be allocated appropriately between Items 7.9a. - 7.9c. If allocation is not possible, the state may allocate the funds to the main category with which the activity is associated.</i></p>			
<i>Note: This information is associated with State Accountability Measures 3Sa and pre-populates the annual report Module 1, Table E.7.</i>			
Remainder/Discretionary Fund Uses		Year One Planned \$	Brief description of services/activities and/or activities
7.9a. Training/technical assistance to eligible entities		\$114,000.00	These planned services/activities will be described in State Plan Item 8.1.
7.9b. Coordination of state-operated programs and/or local programs		\$0.00	These planned services/activities will be described in State Plan Section 9, state Linkages and Communication.
7.9c. Statewide coordination and communication among eligible entities		\$60,000.00	These planned services/activities will be described in State Plan Section 9, state Linkages and Communication.
7.9d. Analysis of distribution of CSBG funds to determine if targeting greatest need		\$0.00	
7.9e. Asset-building programs		\$0.00	
7.9f. Innovative programs/activities by eligible entities or other neighborhood groups		\$0.00	
7.9g. State charity tax credits		\$0.00	
7.9h. Other activities, specify in column 3		\$90,000.00	Each eligible entity will be given the opportunity to request discretionary funding for allowable activities/services/programs per the CSBG Act. The eligible entities request for discretionary funding must include a description of the activity/service/program; identify the need and how it will be addressed; identify the outcomes, goals, and targets to include how they will be measured; how the activity/service/program will be sustained in the future; and a budget.
Total		\$264,000.00	
Remainder/Discretionary Fund Uses		Year Two Planned \$	Brief description of services/activities
7.9a. Training/technical assistance to eligible entities		\$114,000.00	These planned services/activities will be described in State Plan Item 8.1.
7.9b. Coordination of state-operated programs and/or local programs		\$0.00	These planned services/activities will be described in State Plan Section 9, state Linkages and Communication.
7.9c. Statewide coordination and communication among eligible entities		\$60,000.00	These planned services/activities will be described in State Plan Section 9, state Linkages and Communication.
7.9d. Analysis of distribution of CSBG funds to determine if targeting greatest need		\$0.00	
7.9e. Asset-building programs		0	
7.9f. Innovative programs/activities by eligible entities or other neighborhood groups		\$0.00	
7.9g. State charity tax credits		\$0.00	
7.9h. Other activities, specify in column 3		\$90,000.00	Each eligible entity will be given the opportunity to request discretionary funding for allowable activities/services/programs per the CSBG Act. The eligible entities request for discretionary funding must include a description of the activity/service/program; identify the need and how it will be addressed; identify the outcomes, goals, and targets to include how they will be measured; how the activity/service/program will be sustained in the future; and a budget.
Total		\$264,000.00	
<p>7.10. Remainder/Discretionary Funds Partnerships: Select the types of organizations, if any, the State Plans to work with (by grant or contract using remainder/discretionary funds) to carry out some or all of the activities in table 7.9.</p> <p><i>[Check all that apply and narrative where applicable]</i></p>			

<input type="checkbox"/>	The state directly carries out all activities (No Partnerships)
<input type="checkbox"/>	The state partially carries out some activities
<input checked="" type="checkbox"/>	CSBG eligible entities (<i>if checked, include the expected number of CSBG eligible entities to receive funds</i>) 9
<input type="checkbox"/>	Other community-based organizations
<input checked="" type="checkbox"/>	State Community Action association
<input type="checkbox"/>	Regional CSBG technical assistance provider(s)
<input type="checkbox"/>	National technical assistance provider(s)
<input type="checkbox"/>	Individual consultant(s)
<input type="checkbox"/>	Tribes and Tribal Organizations
<input type="checkbox"/>	Other
Note: <i>This response will link to the corresponding CSBG assurance, item 14.2.</i>	
7.11. Use of Remainder/Discretionary Funds Performance Management Adjustment: Describe any adjustments the state will make to the use of remainder/discretionary funds under this State Plan as compared to past plans. Any adjustment should be based on the state's analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the state is not making any adjustments, provide further detail.	
Note: <i>This information is associated with State Accountability Measures 3Sb, and may pre-populate the State's annual report form.</i>	
The Nebraska State CSBG Office will continue to award discretionary funding to CAN (state association) to support the eligible entities with training and technical assistance; system administration; and communication/coordination of statewide activities for FFY 2025 and 2026. The Nebraska State CSBG Office discussed during the state plan meeting in January 2024 with CAN and the eligible entities the use of discretionary funds and funding being obligated to CAN. The remainder of the discretionary funds may be made available for the eligible entities to request via a proposal for allowable costs per the CSBG Act. If other needs are identified (allowable per the CSBG Act), NE DHHS may consider utilizing the remaining discretionary funds for that purpose.	

Section 8: State Training and Technical Assistance

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
Administration for Children and Families
Community Services Block Grant (CSBG)

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SECTION 8 State Training and Technical Assistance

8.1. Training and Technical Assistance Plan: Describe the State's plan for delivering CSBG-funded training and technical assistance to eligible entities under this State Plan by completing the table below. The T/TA plan should include all planned CSBG T/TA activities funded through the administrative or remainder/discretionary funds of this CSBG award (as reported in Section 7). The CSBG T/TA plan should include training and technical assistance conducted directly by the state or through partnerships (as specified in 8.3). Add a row for each activity: indicate the timeframe; whether it is training, technical assistance, or both; and the topic.

Note: This information is associated with State Accountability Measure 3Scand pre-populates the Annual Report, Module 1, Table F.1.

Training and Technical Assistance - Year One

	Planned Timeframe	Training, Technical Assistance, or Both	Topic	Brief Description of "Other"
1	Ongoing / Multiple Quarters	Both	Governance/Tripartite Boards	
2	Ongoing / Multiple Quarters	Both	Organizational Standards - General	
3	Ongoing / Multiple Quarters	Both	Organizational Standards for eligible entities with unmet TAPs and QIPs	
4	Ongoing / Multiple Quarters	Both	Reporting	
5	Ongoing / Multiple Quarters	Both	Monitoring	
6	Ongoing / Multiple Quarters	Both	Technology	

Training and Technical Assistance - Year Two

	Planned Timeframe	Training, Technical Assistance, or Both	Topic	Brief Description of "Other"
1	Ongoing / Multiple Quarters	Both	Governance/Tripartite Boards	
2	Ongoing / Multiple Quarters	Both	Organizational Standards - General	
3	Ongoing / Multiple Quarters	Both	Organizational Standards for eligible entities with unmet TAPs and QIPs	
4	Ongoing / Multiple Quarters	Both	Reporting	
5	Ongoing / Multiple Quarters	Both	Monitoring	
6	Ongoing / Multiple Quarters	Both	Technology	

8.1a. Training and Technical Assistance Budget: The planned budget for the training and technical assistance plan (*as indicated in the Remainder/Discretionary Funds table in item 7.9*):

Year One	\$114,000	Year Two	\$114,000
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8.1b. Training and Technical Assistance Collaboration: Describe how the state will collaborate with the state association and other stakeholders in the planning and delivery of training and technical assistance.

The Nebraska State CSBG awards discretionary funding to CAN to support positions for training and technical assistance and system administration. The training and technical assistance position is responsible for carrying out the majority of items identified in the training and technical assistance plan developed for the Nebraska Community Action Network. This training and technical assistance plan is developed based on feedback from the eligible entities, federal partners, Nebraska State CSBG Office, and CAN. CAN conducts a yearly Regional Performance and Innovation Consortium (RPIC) survey to all eligible entity staff. The system administrator position is responsible for training and oversight of the eligible entities' database and data analysis. The Nebraska State CSBG Office and CAN will also utilize the expertise of federal partners and local stakeholders to meet the needs of the eligible entities for training and technical assistance. CAN will submit reports to the Nebraska State CSBG Office monthly to display the work being completed to assist the network.

8.2. Organizational Standards Technical Assistance: Does the state have Technical Assistance Plans (TAPs) in place for all eligible entities with unmet organizational standards, if appropriate? ☒ Yes ☐ No

Note: 8.2 is associated with State Accountability Measure 6Sb. The state should put a TAP in place to support eligible entities with one or more unmet organizational standards.

8.2a. Address Unmet Organizational Standards: Describe the state's plan to provide T/TA to eligible entities to ensure they address unmet Organizational Standards. If an eligible entity has an unmet organizational standard following self-assessment and/or the Nebraska State CSBG Office validation, the eligible entity will have an opportunity to provide documentation to display that the organizational standard is being met. The Nebraska State CSBG Office will establish this timeframe. If the eligible entity is not able to submit adequate documentation by the established timeframe, the Nebraska State CSBG Office will develop a TAP with that agency. This plan will include the assistance the Nebraska State CSBG Office will provide to assist the agency in meeting the organizational standard, as well as outline the issue, documentation needed from the eligible entity, actions required by the eligible entity, and establish deadlines. The Nebraska State CSBG Office will communicate with entities to monitor and update the TAP on a bi-monthly basis.

8.3. Training and Technical Assistance Organizations: Indicate the types of organizations through which the State Plans to provide training and/or technical assistance as described in item 8.1, and briefly describe their involvement. *[Check all that apply.]*

<input type="checkbox"/>	All T/TA is conducted by the state
<input type="checkbox"/>	CSBG eligible entities (<i>if checked, provide the expected number of CSBG eligible entities to receive funds</i>)
<input checked="" type="checkbox"/>	Other community-based organizations
<input checked="" type="checkbox"/>	State Community Action association
<input checked="" type="checkbox"/>	Regional CSBG technical assistance provider(s)
<input type="checkbox"/>	National technical assistance provider(s)
<input type="checkbox"/>	Individual consultant(s)
<input type="checkbox"/>	Tribes and Tribal Organizations
<input type="checkbox"/>	Other

8.4.CSBG-Funded T/TA Performance Management Adjustment:Describe adjustments the state made to the training and technical assistance plan under this State Plan as compared to past plans. Any adjustment should be based on the state's analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the state is not making any adjustments, provide further detail.

Note: This information is associated with State Accountability Measures 3Sd may pre-populate the state's annual report form

The Nebraska State CSBG Office awards discretionary funding to CAN to support a position for training and technical assistance. CAN will meet individualized and group TTA needs for the eligible entities, as needed, by providing TTA directly or by helping the eligible entities identify other resources to meet their needs. The Nebraska State CSBG Office plans to continue to seek additional guidance and training from federal partners through consultation, webinars, in-person trainings, conference calls, etc. CAN completes surveys after the trainings are provided to the Nebraska Community Action Network, so the network can evaluate the trainings.

Section 9: State Linkages and Communication

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
Administration for Children and Families
Community Services Block Grant (CSBG)

Form Approved
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SECTION 9 State Linkages and Communication

Note: This section describes activities that the state may support with CSBG remainder/discretionary funds, described under Section 675C(b)(1) of the CSBG Act. The state may indicate planned use of remainder/discretionary funds for linkage/communication activities in Section 7, State Use of Funds, items 7.9(b) and (c).

9.1. State Linkages and Coordination at the State Level:

Describe the linkages and coordination at the state level that the state intends to create or maintain to ensure increased access to CSBG services to low-income people and communities under this State Plan and avoid duplication of services (as required by the assurance under Section 676(b)(5)).

Describe additional information as needed.

Note: This response will link to the corresponding CSBG assurance, item 14.5. In addition, this item is associated with State Accountability Measure 7Sa andand pre-populates the Annual Report, Module 1, Item G.1.

- ☒ State Low Income Home Energy Assistance Program (LIHEAP) office
- ☒ State Weatherization office
- ☒ State Temporary Assistance for Needy Families (TANF) office
- ☐ Head Start State Collaboration offices
- ☒ State public health office
- ☐ State education department
- ☒ State Workforce Innovation and Opportunity Act (WIOA) agency
- ☒ State budget office
- ☒ Supplemental Nutrition Assistance Program (SNAP)
- ☐ State child welfare office
- ☐ State housing office
- ☒ Other

In FFY 2024, the Commodity Supplemental Food Program (CSFP) moved from Public Health to OEA within the Community-Based Programs unit. This has improved partnerships between the programs. CSFP, Local Food Purchase Assistance Program (LFPA), Food Distribution (FDP), The Emergency Food Assistance Program (TEFAP), and several Temporary Assistance for Needy Family (TANF) funded programs (Crisis Pregnancy, Healthy Marriage and Responsible Fatherhood Initiative, Jobs for Americas Graduates [JAG], etc.) are now within the same unit. The Community-Based Programs are housed within OEA, which includes other programs such as: Aid to the Aged, Blind, and Disabled (AABD); Childcare; Refugee Resettlement; Supplemental Nutrition Assistance Program (SNAP); Social Services Block Grant (SSBG); Low Income Household Water Assistance Program (LIHWAP); and Aid to Dependent Children (ADC). These programs collaborate to meet client needs by ensuring the Nebraska State CSBG Office and community partners are well-informed of the services and opportunities offered through these programs. The Nebraska State LIHEAP Office contracts with the Nebraska Department of Environment and Energy Office (NDEE) to manage the Weatherization program. The NDEE Office awards funding to eight (8) agencies to carry out the Weatherization program. Seven (7) of the eight (8) Weatherization agencies are CSBG-eligible entities. The Nebraska State CSBG Office plans to further collaborate with other programs that the eligible entities implement such as Head Start and Supplemental Nutrition Program for Women, Infants, and Children (WIC). The Nebraska State CSBG Office currently participates in a monthly meeting with the Nebraska Children and Families Foundation, NE DHHS Child Welfare, NE DHHS Behavioral Health, Nebraska Homeless Assistance Program (NHAP) staff, etc. These monthly meetings are aimed at creating coordination and linkages to prevent abuse and neglect across the state. The Nebraska State CSBG Office attends OEA meetings to share information with and obtain information from multiple state-operated programs. In addition, the Nebraska State CSBG Office participates in Nebraska Partner Council meetings, which include agencies such as the Department of Labor (NDOL), Department of Education, etc.

9.2. State Linkages and Coordination at the Local Level:

Describe how the state is encouraging partnerships and collaborations at the state level with public and private sector organizations, to assure the effective delivery and coordination of CSBG services to transform low-income communities and avoid duplication of services (as required by assurances under Sections 676(b)(5) - (6))

Note: This response will link to the corresponding CSBG assurances, items 14.5 and 14.6., and pre-populates the Annual Report, Module 1, Item G.2.

The Nebraska State CSBG Office continually communicates with other areas of NE DHHS and other government agencies to ensure that eligible entities are provided with correct information regarding Economic Assistance Programs, Medicaid Programs, Child Welfare Services, Public Health Programs, and any other statewide services and programs. By providing and continually educating eligible entities regarding these programs and services, the Nebraska State CSBG Office ensures the eligible entities are better able to assist clients and works to eliminate possible duplication of services. In addition, the constant communication with other government programs is anticipated to help the Nebraska State CSBG Office to be able to inform eligible entities of potential grant opportunities.

9.3. Eligible Entity Linkages and Coordination

9.3a. State Assurance of Eligible Entity Linkages and Coordination: Describe how the state will assure that eligible entities will partner and collaborate with public and private sector organizations to assure the effective delivery and coordination of CSBG services to low-income people and communities and avoid duplication of services (as required by the assurance under Section 676(b)(5)).

Note: This response will link to the corresponding CSBG assurance, item 14.5. and pre-populates the Annual Report, Module 1, Item G.3a.

The Nebraska State CSBG Office incorporates information regarding this into the CSBG Community Action Plan. Eligible entities are required to complete a narrative explaining how the agency plans to coordinate and establish linkages to assure the effective delivery of and coordination of CSBG services to low-income people and communities, as well as avoid duplication of services. The Nebraska State CSBG Office also plans to further discuss the progress and impact of the linkages with staff from the eligible entities, as well as to determine if there is any need for support from the Nebraska State CSBG Office. Linkages and coordination is an area that is reviewed during the on-site monitoring review process. The Nebraska State CSBG Office asks several questions regarding partnerships within the community, referral processes, involvement in community meetings focused on coordinating services, creating programs jointly with other organizations, etc.

9.3b State Assurance of Eligible Entity Linkages to Fill Service Gaps:

Describe how the eligible entities will develop linkages to fill identified gaps in the services, through the provision of information, referrals, case management, and follow-up consultations, according to the assurance under Section 676(b)(3)(B) of the CSBG Act.

Note: This response will link to the corresponding CSBG assurance, item 14.3b., and pre-populates the Annual Report, Module 1, Item G.3b.

The Nebraska State CSBG Office incorporates information regarding this into the CSBG Community Action Plan. Eligible entities are required to complete a narrative explaining how the agency plans to coordinate and establish linkages to assure the effective delivery of and coordination of CSBG services to low-income people and communities, as well as avoid duplication of services. The Nebraska State CSBG Office also plans to further discuss the progress and impact of the linkages with staff from the eligible entities, as well as to determine if there is any need for support from the Nebraska State CSBG Office. Linkages and coordination are an area that is reviewed during the on-site monitoring review process. The Nebraska State CSBG Office asks several questions regarding partnerships within the community, referral processes, involvement in community meetings focused on coordinating services, creating programs jointly with other organizations, etc.

9.4. Workforce Innovation and Opportunity Act (WIOA) Employment and Training Activities:

Does the state intend to include CSBG employment and training activities as part of a WIOA Combined State Plan, as allowed under the Workforce Innovation and Opportunity Act (as required by the assurance under Section 676(b)(5) of the CSBG Act)? ☐ Yes

☒ No

Note: This response will link to the corresponding CSBG assurance, item 14.5.

9.4a. WIOA Combined Plan: If the state selected "yes" under item 9.4, provide the CSBG-specific information included in the state's WIOA Combined Plan. This information includes a description of how the state and the eligible entities will coordinate the provision of employment and training activities through statewide and local WIOA workforce development systems. This information may also include examples of innovative employment and training programs and activities conducted by community action agencies or other neighborhood-based organizations as part of a community antipoverty strategy.

9.4b. Employment and Training Activities: If the state selected "no" under item 9.4, describe the coordination of employment and training activities, as defined in Section 3 of WIOA, by the state and by eligible entities providing activities through the WIOA system.

NDOL is responsible for the local-level coordinated effort of the Work Innovation and Opportunity Act (WIOA). The coordinated effort is divided into three WIOA regions: Greater Nebraska, Greater Lincoln, and Greater Omaha. The eligible entities who serve in the location of the current One-Stop Operations have local-level Memorandums of Understanding (MOU) to create a local-level customer-focused American Job Center Network. The Nebraska CSBG Office has provided support for the local-level effort through collaboration with state government partners and will obtain information from the Office of Community Services (OCS)/other involved parties when needed. The Nebraska State CSBG Office was not involved in any negotiations of the agreements and MOUs, but encourages eligible entities to work with the local WIOA boards regarding their role in Employment and Training Activities via the American Job Centers.

9.5. Emergency Energy Crisis Intervention:

Describe how the state will assure, where appropriate, that emergency energy crisis intervention programs under Title XXVI (relating to Low-Income Home Energy Assistance) are conducted in each community in the state, as required by the assurance under Section 676(b)(6) of the CSBG Act).

Note: This response will link to the corresponding CSBG assurance, item 14.6.

LIHEAP is primarily a state-administered program in Nebraska. LIHEAP funds are not awarded to eligible entities to assist households with emergency energy assistance needs. NE DHHS has an interagency agreement with NDEE to utilize a portion of the LIHEAP funds for weatherization services. NDEE subawards LIHEAP funds to local agencies, some of which are CSBG-eligible entities, to provide weatherization services. Households are able to apply for and request home energy-related crisis assistance from the state office. Households can apply/request assistance in person, online, via mail, or via phone to ensure assistance is available to households across the State of Nebraska. The eligible entities administer/participate in additional emergency assistance programs in which assistance can be provided. The Nebraska State CSBG Office incorporated information regarding this into the CSBG Community Action Plan. Eligible entities are required to complete a narrative explaining how the entity provides emergency services and supplies. The Nebraska State CSBG Office will further discuss emergency services with staff from the eligible entities. The Nebraska State CSBG Office also asks questions regarding emergency services during the onsite monitoring review process.

9.6. Faith-based Organizations, Charitable Groups, Community Organizations:

Describe how the state will assure local eligible entities will coordinate and form partnerships with other organizations, including faith-based organizations, charitable groups, and community organizations, according to the state's assurance under Section 676(b)(9) of the CSBG Act.

Note: this response will link to the corresponding assurance, item 14.9.

The Nebraska State CSBG Office incorporates information regarding this into the CSBG Community Action Plan. Eligible entities are required to complete a narrative explaining coordination and partnership with other organizations, which includes faith-based organizations, charitable groups, and community organizations. The Nebraska State CSBG Office plans to discuss partnerships with staff from the eligible entity. The Nebraska State CSBG Office also asks questions regarding partnerships during the onsite monitoring review process.

9.7. Coordination of Eligible Entity 90 Percent Funds with Public/Private Resources:

Describe how the eligible entities will coordinate CSBG 90 percent funds with other public and private resources, according to the assurance under Section 676(b)(3)(C) of the CSBG Act.

Note: this response will link to the corresponding assurance, item 14.3c.

The Nebraska State CSBG Office incorporates information regarding this into the CSBG Community Action Plan. Eligible entities are required to complete a narrative explaining the coordination of CSBG funds with other public and private resources. The Nebraska State CSBG Office plans to discuss the coordination of funds with public and private resources with staff from the eligible entities. The Nebraska State CSBG Office also asks questions regarding resources and fund development during the onsite monitoring review process.

9.8. Coordination among Eligible Entities and State Community Action Association:

Describe state activities for supporting coordination among the eligible entities and the state community action association.

Note: This information will pre-populate the Annual Report, Module 1, Item G.5.

The state community action association in Nebraska is CAN. The Nebraska State CSBG Office is the largest funder of CAN. The Nebraska State CSBG Office awards discretionary funding to CAN to coordinate outreach; provide technical assistance and training to all eligible entities; provide data entry and data quality technical support to all entities; and coordinate the completion of the annual report. The Nebraska State CSBG Office and CAN have a good working relationship and meet regularly to discuss eligible entity needs. Both the Nebraska State CSBG Office and CAN participate in the Regional Performance and Innovation Consortium (RPIC) and continue to improve activities under that grant.

9.9. Communication with Eligible Entities and the State Community Action Association:

In the table below, detail how the state intends to communicate with eligible entities, the state community action association, and other partners identified under this State Plan on the topics listed below. For any topic that is not applicable, select "Not Applicable" under Expected Frequency.

Communication Plan			
Subject Matter	Expected Frequency	Format	Brief description of "Other"
Upcoming Public and/or Legislative Hearings	As needed		
State Plan Development	As needed		
Organizational Standards Progress	As needed		
State Accountability Measures Progress	As needed		
Community Needs Assessments/ Community Action Plans	As needed		
State Monitoring Plans and Policies	As needed		
Training and Technical Assistance (TTA) Plans	As needed		
ROMA and Performance Management	As needed		
State Interagency Coordination	As needed		
CSBG Legislative/Programmatic Updates	As needed		
Tripartite Board Requirements	Quarterly		

9.10. Feedback to Eligible Entities and State Community Action Association:

Describe how the state will provide information to local entities and state community action associations regarding performance on state accountability measures.

Note: This information is associated with State Accountability Measure 5S(iii). and will pre-populate the Annual Report, Module 1, Item G.6

The Nebraska State CSBG Office facilitates meetings with the executive directors of all eligible entities and CAN to discuss the needs of the network, provide updates, allow the eligible entities opportunities to provide feedback, and promote open communication. The Nebraska State CSBG Office sent the results of the ACSI survey to the eligible entities and CAN for review. In addition, the Nebraska State CSBG Office held a meeting to discuss the results and to discuss areas of needed improvement. Additionally, the Nebraska State CSBG Office met with and will continue to communicate with the executive directors of the eligible entities and CAN to review the components and information in the state plan, the annual reports, etc. The Nebraska State CSBG Office will notify the eligible entities and CAN of the performance on the State Accountability Measures via email and will discuss during meetings.

9.11. Communication Plan Performance Management Adjustment:

Describe any adjustments the state made to the Communication Plan in this State Plan as compared to past plans. Any adjustment should be based on the state's analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the state is not making any adjustments, provide further detail.

Note: This information is associated with State Accountability Measures 7Sb; this response may pre-populate the state's annual report form.

Based on the most recent results of the ACSI survey and follow-up with the eligible entities, the Nebraska State CSBG Office prioritized the following areas: distribution of funds, responsiveness of staff, linkages, and TTA. A memo was sent to the eligible entities on July 19, 2021, informing them of the identified priorities. The following steps have been taken to address the priority areas: Distribution of Funds: The concerns identified were regarding the amount of time it took for funds to be obligated. Federal funds for October 1 are not received from OCS until mid-November, and the subaward process takes approximately three (3) months. After a subaward is executed, the entity can submit a request for reimbursement. The reimbursement takes approximately thirty (30) days. To address this, the Nebraska State CSBG Office required the Community Action Plan and budget to be submitted earlier in the year. This allowed the subaward to be executed prior to the start of the federal fiscal year. The Nebraska State CSBG Office also received priority processing from the Nebraska Office of Procurement and Grants for all CSBG funding so that the awards are signed and awarded within thirty (30) days. Responsiveness of Staff: This area was not rated particularly low per the ACSI Survey Results; however, this is an area in need of improvement per self-assessment. All requests and the timeliness of responses are being tracked on a quality development inventory and productivity (QDIP) board for review and monitoring. Linkages: This score increased slightly from 2019; however, there continues to be opportunities for improvement. The Nebraska State CSBG Office was inviting staff from state or community programs to present at the monthly eligible entity executive director/chief executive officers CSBG meetings; however, based on feedback from the eligible entities, the presentations were ended. CSBG staff continue to attend meetings to obtain information to share with CAN and the eligible entities. The Nebraska State CSBG Office continues to explore the most effective manner of assisting to develop linkages. Training and Technical Assistance (TTA): Per the ACSI Survey results, this score increased by 6 points from 2019; however, there continues to be opportunities for improvement in this area. The Nebraska State CSBG Office awards funds to CAN to provide TTA. The Nebraska State CSBG Office created and implemented new reporting forms to identify the TTA provided and needed. The Nebraska State CSBG Office meets regularly with CAN to ensure quality input is obtained in the creation of the TTA Plan and to ensure valuable TTA is provided to the entities.

Section 10: Monitoring, Corrective Action, and Fiscal Controls

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
Administration for Children and Families
Community Services Block Grant (CSBG)

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SECTION 10 Monitoring, Corrective Action, and Fiscal Controls

Monitoring, Corrective Action and Fiscal Controls (Section 678B(a) of the Act)

10.1. Specify the proposed schedule for planned monitoring visits - including full on-site reviews; on-site reviews of newly designated entities; follow-up reviews - including return visits to entities that failed to meet State goals, standards, and requirements; and other reviews as appropriate.

This is an estimated schedule to assist states in planning. States may indicate "no review" for entities the state does not plan to monitor in the performance period.

Note: This information is associated with State Accountability Measure 4Sa(i); this response pre-populates the Annual Report, Module 1, Table H.1.

	CSBG Eligible Entity	Monitoring Type	Review Type	Target Quarter	Start Date of Last Full Onsite Review	End Date of Last Full Onsite Review	Brief Description of "Other"
1	Blue Valley Community Action, Inc.	Full On-site	Onsite Review	FY1 Q1	11/09/2021	11/17/2021	
2	Community Action Partnership of Lancaster and Saunders Counties	No review					
3	Community Action Partnership of Western Nebraska	No review					
4	Central Nebraska Community Action Partnership, Inc	No review					
5	Eastern Nebraska Community Action Partnership	No review					
6	Community Action	No review					
7	Northeast Nebraska Community Action Partnership, Inc.	Full On-site	Onsite Review	FY1 Q1	12/07/2021	02/03/2022	
8	Northwest Community Action Partnership	No review					
9	Southeast Nebraska Community Action Partnership, Inc.	Full On-site	Onsite Review	FY1 Q4	03/17/2022	03/23/2022	
	CSBG Eligible Entity	Monitoring Type	Review Type	Target Quarter	Start Date of Last Full Onsite Review	End Date of Last Full Onsite Review	Brief Description of "Other"
1	Blue Valley Community Action, Inc.	No review					
2	Community Action Partnership of Lancaster and Saunders Counties	Full On-site	Onsite Review	FY2 Q1	11/16/2022	11/28/2022	
3	Community Action Partnership of Western Nebraska	Full On-site	Onsite Review	FY2 Q1	08/29/2023	09/11/2023	
4	Central Nebraska Community Action Partnership, Inc	Full On-site	Onsite Review	FY2 Q4	10/18/2022	10/19/2022	
5	Eastern Nebraska Community Action Partnership	No review					
6	Community Action	No review					
7	Northeast Nebraska Community Action Partnership, Inc.	No review					
8	Northwest Community Action Partnership	No review					
9	Southeast Nebraska Community Action Partnership, Inc.	No review					

10.2. Monitoring Policies:

Provide a copy of state monitoring policies and procedures by attaching and/or providing a hyperlink.

10.3. Initial Monitoring Reports:

According to the state's procedures, by how many calendar days must the State disseminate initial monitoring reports to local entities?

Note: This item is associated with State Accountability Measure 4Sa(ii) and may pre-populate the state's annual report form.

**Corrective Action, Termination and Reduction of Funding and Assurance Requirements
(Section 678C of the Act)**

10.4. Closing Findings:

Are state procedures for addressing eligible entity findings/deficiencies and documenting the closure of findings, included in the State monitoring protocols attached above? ☒ Yes ☐ No

10.4a. Closing Findings Procedures: If no describe state procedures for addressing eligible entity findings/deficiencies, and documenting the closure of findings.

10.5. Quality Improvement Plans (QIPs):

Provide the number of eligible entities currently on QIPs, if applicable.

Note: The QIP information is associated with State Accountability Measures 4Sc.

0

10.6. Reporting of QIPs:

Describe the state's process for reporting eligible entities on QIPs to the Office of Community Services within 30 calendar days of the State approving a QIP

Note: This item is associated with State Accountability Measures 4Sa(iii).

If an entity is found to have significant deficiencies, the Nebraska State CSBG Office will submit a written report to the entity's executive director/CEO explaining the deficiencies and the corrective actions the entity must complete. This includes requiring the entity to submit a Quality Improvement Plan (QIP). The entity has sixty (60) days to provide a QIP to the Nebraska State CSBG Office. The Nebraska State CSBG Office will approve the entity's QIP or request a revised QIP within thirty (30) days of the receipt of the QIP. Once final, the QIP will be sent to the OEA Deputy Director of Policy and Programs for final approval. Once the QIP is approved, the Nebraska State CSBG Office will notify the entity and monitor the entity for progress and improvement. The Nebraska State CSBG Office will provide training and technical assistance to the entity to help correct the deficiency, as determined appropriate.

10.7. Assurance on Funding Reduction or Termination:

The state assures, "that any eligible entity that received CSBG funding the previous fiscal year 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 678C(b)" per Section 676(b)(8). ☒ Yes ☐ No

Note: This response will link with the corresponding assurance under item 14.8.

Policies on Eligible Entity Designation, De-designation, and Re-designation

10.8. Eligible Entity Designation: Do the State CSBG statute and/or regulations provide for the designation of new eligible entities? ☐ Yes ☒ No

10.8a. New Designation Citation: If yes, provide the citation(s) of the law and/or regulation.

10.8b. New Designation Procedures: If no, describe state procedures for the designation of new eligible entities and how the procedures were made available to eligible entities and the public

The Nebraska CSBG Policy Manual, Section 1202, describes the procedures for designation, de-designation, and re-designation. Nebraska follows guidelines in Sections 676A and 678C of the CSBG Act (42 U.S.C. 9901 et seq.), as well as the CSBG Information Memorandum, Transmittal #116. This information is made available to the eligible entities in the Nebraska CSBG Policy Manual and the CSBG Act. The CSBG Act is publicly available.

10.9. Eligible Entity Termination: Do State CSBG statute and/or regulations provide for termination of eligible entities ☐ Yes ☒ No

10.9a. Termination Citation: If yes, provide the citation(s) of the law and/or regulation.

10.9b. Termination Procedures: If no, describe state procedures for termination of new eligible entities and how the procedures were made available to eligible entities and the public

The Nebraska CSBG Policy Manual, Section 1202, describes the procedures for designation, de-designation, and re-designation. Nebraska follows the guidelines in Sections 676A and 678C of the CSBG Act (42 U.S.C. 9901 et seq.), as well as the CSBG Information Memorandum, Transmittal #116. This information is made available to the eligible entities in the Nebraska CSBG Policy Manual and the CSBG Act. The CSBG Act is publicly available.

10.10. Does the State CSBG statute and/or regulations specify a process the State CSBG agency must follow to re-designate an existing eligible entity? ☐ Yes ☒ No

10.10a. If Yes, provide the citation(s) of the law and/or regulation.

10.10b. If No, describe State procedures for re-designation of existing eligible entities.

The Nebraska CSBG Policy Manual, Section 1202, describes the procedures for designation, de-designation, and re-designation. Nebraska follows the guidelines in Sections 676A and 678C of the CSBG Act (42 U.S.C. 9901 et seq.), as well as the CSBG Information Memorandum, Transmittal #116. This information is made available to the eligible entities in the Nebraska CSBG Policy Manual and the CSBG Act. The CSBG Act is publicly available.

Fiscal Controls and Audits and Cooperation Assurance

10.11. Fiscal Controls and Accounting:

Describe how the state's fiscal controls and accounting procedures will a) permit preparation of the SF-425 Federal fiscal reports (FFR) and b) permit the tracing of expenditures adequate to ensure funds have been used appropriately under the block grant, as required by Block Grant regulations applicable to CSBG at 45 CFR 96.30(a).

The Nebraska State CSBG Office has regular meetings with Grants Management within the financial services team within NE DHHS. The purpose of these meetings is to ensure that all federal fiscal reports are prepared accurately and timely, as well as for grants management staff to provide support to Nebraska State CSBG Program staff to ensure that funds are expended appropriately.

10.12. Single Audit Management Decisions:

Describe state procedures for issuing management decisions for eligible entity single audits, as required by Block Grant regulations applicable to CSBG at 45 CFR 75.521.

Note: This information is associated with State Accountability Measure 4Sd.

Eligible entities that expect to expend \$750,000 or more from all Federal Financial Assistance sources, including commodities in a fiscal year, are required to select that they are subject to the single audit requirements of 2 CFR 200/45 CFR 75 within their subaward agreement. Eligible entities are required to engage a licensed Certified Public Accountant to conduct and prepare the audit of their organizations financial statements and components of the single audit pertaining to those financial statements. Eligible entities acknowledge that the audited financial statements should be presented in accordance with generally accepted accounting principles (accrual basis). If another basis of accounting is more appropriate or if the accrual basis of accounting is overly burdensome, eligible entities must notify NE DHHS of this issue and request a waiver of this requirement prior to the end of their fiscal year. Eligible entities must have their audit completed no later than nine (9) months after the end of their fiscal year, performed in accordance with 2 CFR 200/45 CFR 75, and submitted to the Federal Audit Clearinghouse. Eligible entities and their auditors must complete and submit with the reporting package a Data Collection Form for Reporting on audits of States, Local Governments, and Non-Profit Organizations (SF-SAC). The reporting package, as evidence the audit was completed, must contain: financial statements; a schedule of Expenditure of Federal Awards; a Summary Schedule or Prior Audit Findings (if applicable); a corrective action plan (if applicable); the auditors report(s), which includes an opinion upon financial statements and Schedule of Expenditures of Federal Awards; a report of internal control; a report of compliance; and a Schedule of Findings and Questioned Costs. Eligible entities must submit a copy of the financial statements, auditors report, and SF-SAC to NE DHHS within the earlier of thirty (30) days after receipt of the auditors report(s) or nine (9) months after the end of the audit period. The Internal Audit Department at NE DHHS will review the eligible entities on the Federal Audit Clearinghouse to ensure that the single audit performed is submitted and identify if there are any findings on the most current audit. If the eligible entity's audit has not been submitted to the Federal Audit Clearinghouse or there are findings from the audit performed, the Internal Audit Department will notify all programs impacted by the audit findings. The programs impacted will follow up with the eligible entity regarding the audit findings.

10.13. Assurance on Federal Investigations:

The state will "permit and cooperate with Federal investigations undertaken in accordance with Section 678D" of the CSBG Act, as required by the assurance under Section 676(b)(7) of the CSBG Act. ☒ Yes ☐ No

Note: This response will link with the corresponding assurance, Item 14.7.

10.13a. Federal Investigations Policies: Are state procedures for permitting and cooperating with federal investigations included in the state monitoring policies attached under 10.2? ☐ Yes ☒ No

10.13b. Closing Findings Procedures: If no, describe state procedures for permitting and cooperating with federal investigations.

Nebraska's CSBG State Plan assures the NE DHHS will permit and cooperate with federal investigations concerning Nebraska's CSBG program." The subawards for the eligible entities state the agencies must "Permit and cooperate with any state or federal investigations undertaken in accordance with Section 679 of the CSBG Act or any other provision of state or federal laws or regulations.

10.14. Monitoring Procedures Performance Management Adjustment:

Describe any adjustments the state made to monitoring procedures in this State Plan as compared to past plans? Any adjustment should be based on the state's analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the state is not making any adjustments, provide further detail.

Note: This item is associated with State Accountability Measure 4Sb and may pre-populate the state's annual report form.

The Nebraska State CSBG Office has not updated the onsite monitoring paperwork since the last state plan. The Nebraska State CSBG Office will continue to implement the monitoring plan by conducting desk reviews and on-site monitoring. The Nebraska State CSBG Office plans to continue to improve on its monitoring procedures in FFY 2025 and 2026, as more guidance is provided by federal partners. In addition, the Nebraska State CSBG Office will continue to work with the Internal Audit Department to ensure adequate monitoring occurs.

Section 11: Eligible Entity Tripartite Board

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
Administration for Children and Families
Community Services Block Grant (CSBG)

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SECTION 11 Eligible Entity Tripartite Board

11.1. Tripartite Board Verification: Verify which of the following measures are taken to ensure that the state verifies CSBG Eligible Entities are meeting Tripartite Board requirements under Section 676B(a)(2) of the CSBG Act *[Check all that applies and narrative where applicable]*

- ☒ Attend Board meetings
- ☒ Organizational Standards Assessment
- ☒ Monitoring
- ☒ Review copies of Board meeting minutes
- ☒ Track Board vacancies/composition
- ☐ Other

11.2. Tripartite Board Updates: Provide how often the state require eligible entities (which are not on TAPs or QIPs) to provide updates regarding their Tripartite Boards. This includes but is not limited to copies of meeting minutes, vacancy alerts, changes to bylaws, low-income member selection process, etc., *[Select one and narrative where applicable]*

- ☐ Annually
- ☐ Semiannually
- ☒ Quarterly
- ☐ Monthly
- ☐ As it Occurs
- ☐ Other

11.3. Tripartite Board Representation Assurance: Describe how the state will verify that eligible entities have policies and procedures by which individuals or organizations can petition for adequate representation on an eligible entity's Tripartite Board as required by the assurance under Section 676(b)(10) of the CSBG Act

Note: This response will link with the corresponding assurance, item 14.10.

This requirement is included in the State of Nebraska Community Services Block Grant Program Policy Manual. All eligible entities are required to follow the State of Nebraska Community Services Block Grant Program Policy Manual, as set forth in their subaward agreements. The Nebraska State CSBG Office has also integrated this assurance into the onsite monitoring review. The Nebraska State CSBG Office reviews an entity's policies, procedures, and bylaws prior to the onsite review. While the Nebraska State CSBG Office is onsite, an interview is conducted with the executive director/ chief executive officer regarding board governance. One of the questions included in the board governance interview is regarding the eligible entity's process for allowing individuals or organizations to petition for adequate representation on the tripartite board.

11.4. Tripartite Board Alternative Representation: Does the state permit public eligible entities to use, as an alternative to a Tripartite Board, "another mechanism specified by the state to assure decision-making and participating by low income individuals in the development, planning, implementation, and evaluation of programs" as allowed under Section 676B(b)(2) of the CSBG Act. ☐ Yes ☒ No

11.4a. Tripartite Board Alternative Mechanism: If yes, describe the mechanism used by public eligible entities as an alternative to a Tripartite Board.

Section 12: Individual and Community Eligibility Requirements

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
Administration for Children and Families
Community Services Block Grant (CSBG)

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SECTION 12 Individual and Community Income Eligibility Requirements

12.1. Required Income Eligibility:

Provide the income eligibility threshold for services in the state.

[Check one item below.]

☒ 125% of the HHS poverty line ☐ X% of the HHS poverty line (fill in the threshold) ☐ Varies by eligible entity

0% % *[Response Option: numeric field]*

12.1a. Income Eligibility Policy and Procedures: Describe any state policy and/or procedures for income eligibility, such as treatment of income and family/household composition.

For CSBG-funded services, eligible entities can utilize a 20% Earned Income Disregard for any individual that has earned income at the time of the application. However, the CSBG income eligibility limit is only a requirement of CSBG-funded programs. Eligible entities providing CSBG-funded direct client services to clients are required to verify and document proof of income eligibility. Eligible entities are required to use their own written policies concerning the verification of income. For foster children or youth that are wards of the state, the public funds for the youths support and/or the foster families income should not be used in determining the youths income eligibility for services provided with CSBG program funds. For services funded by other sources, that funding source determines income eligibility requirements and thresholds. Thus, income eligible thresholds for services vary by the eligible entity. For CSBG-funded services where individual income verification is not possible or practical, entities may request to waive the CSBG client income eligibility and verification requirements. Entities interested in obtaining a CSBG client income eligibility and verification waiver must contact NE DHHS for request.

12.2. Income Eligibility for General/Short-Term Services:

Describe how the state ensures eligible entities generally verify income eligibility for those services with limited in-take procedures (where individual income verification is not possible or practical).An example of these services is emergency food assistance.

The Nebraska State CSBG Office has included requirements regarding income eligibility and verification in the State of Nebraska Community Services Block Grant Policy Manual and the subaward agreement. Nebraska does not have restrictions on CSBG funding other than what is contained in the CSBG Act. The amount of CSBG funding used toward direct client services is relatively low in Nebraska for all eligible entities. Most eligible entities utilize CSBG funding to support administrative costs of the agency, due to most other funding sources having more restrictions. For CSBG-funded services, the client must be determined to be under the federal poverty level for the corresponding FFY. For these services when individual income verification is not possible or practical, eligible entities may request to waive the CSBG client income eligibility and verification requirements. Eligible entities interested in obtaining a CSBG client income eligibility and verification waiver must contact the Nebraska State CSG Office for request and submittal instructions. The Nebraska State CSBG Office will allow self-reporting of income by clients as long as that practice is approved by the Nebraska State CSBG Office and noted in the eligible entitys policies and procedures. For services funded by other programs and sources, the eligible entity must comply with that particular funders requirements regarding income eligibility verification. The Nebraska State CSBG Office also conducts client file reviews to ensure that income was verified. However, the Nebraska State CSBG Office does not ensure that client income verification was completed based on other funder criteria. It is assumed that other funders assure the eligible entities are compliant with their program requirements regarding client income verification. All Nebraska-eligible entities are also required to have a single audit conducted by an outside firm, which completes a compliance report. All eligible entities are required to submit other funder compliance reports and their completed single audit report to the Nebraska State CSBG Office.

12.3. Community-targeted Services: Describe how the state ensures eligible entities' services target and benefit low-income communities for services that provide a community-wide benefit (e.g., development of community assets/facilities, building partnerships with other organizations).

The Nebraska State CSBG Office incorporates information regarding this into the CSBG Community Action Plan. Eligible entities are required to provide a narrative regarding how the entity plans to provide community-wide benefit programs and ensure low-income communities are targeted. The Nebraska State CSBG Office plans to discuss the community-wide programs with staff from the eligible entity throughout the year. Eligible entities base decisions to work with other organizations on community-wide efforts (either as a partner or as a lead) on their community needs assessment. These identified needs are representative of the low-income communities within the areas that the eligible entities serve.

Section 13: Results Oriented Management and Accountability (ROMA) System

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
Administration for Children and Families
Community Services Block Grant (CSBG)

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SECTION 13 Results Oriented Management and Accountability (ROMA) System

13.1. Performance Measurement System:

Identify the performance measurement system that the state and all eligible entities use, as required by Section 678E(a) of the CSBG Act and the assurance under Section 676(b)(12) of the CSBG Act.

Note: This response will also link to the corresponding assurance, Item 14.12. and will pre-populate the Annual Report, Module 1, Item I.1.

- ☒ The Results Oriented Management and Accountability (ROMA) System
- ☐ Another performance management system that meets the requirements by Section 678E(b) of the CSBG Act
- ☐ An alternative system for measuring performance and results

13.1a. ROMA Description: If ROMA was chosen in Item 13.1, describe the state's written policies, procedures, or guidance documents on ROMA.

The Nebraska State CSBG Office requires eligible entities to participate in ROMA, a framework for continuous growth and improvement that OCS requires all CSBG recipients utilize. This framework includes National Performance Indicators (NPI) to continually assess implementation and performance. This requirement is stated in the State of Nebraska Community Services Block Grant Program Policy Manual and the subaward agreement. The Nebraska State CSBG Office provides all the necessary Community Action NPI report forms, instructions, guidance, and participation requirements that are published by OCS, CAP, NASCSP, and CAPLAW. The Nebraska State CSBG Office has also worked with the eligible entities and CAN to create a ROMA Taskforce. This task force is a planning committee made up of Nebraska State CSBG Program Staff, CAN staff, and eligible entity staff. The ROMA Taskforce is responsible for collaborating with the Nebraska State CSBG Office to continuously improve ROMA implementation in Nebraska's Community Action Network, including developing any additional materials needed to supplement materials provided by CSBG federal partners. The ROMA Taskforce will meet one to two times a year.

13.1b. Alternative System Description: If an alternative system was chosen in Item 13.1, describe the system the state will use for performance measurement.

13.2. Outcome Measures: Indicate and describe the outcome measures the state will use to measure eligible entity performance in promoting self-sufficiency, family stability, and community revitalization, as required under Section 676(b)(12) of the CSBG Act.

Note: This response will also link to the corresponding assurance, Item 14.12.

- ☒ CSBG National Performance Indicators (NPIs)
- ☐ NPIs and others
- ☐ Others

All eligible entities are required to submit an annual progress report based on the targets set in their CSBG Community Action Plan. These progress reports are incorporated into the Module 2, Module 3, and Module 4 reporting tools. The Nebraska State CSBG Office reviews these reports and discusses updates with each agency. The eligible entities are also required to submit a quarterly performance report with the numbers of participants for all of their programs.

13.3. Eligible Entity Support: Describe how the state supports the eligible entities in using the ROMA or alternative performance measurement system.

Note: The activities described under Item 13.3 may include activities... listed in "Section 8: State Training and Technical Assistance." If so, mention briefly, and/or cross-reference as needed. This response will also link to the corresponding assurance, item 14.12.

The Nebraska State CSBG Office awards discretionary funding to CAN through a subaward agreement to support a system administrator position and a training and technical assistance position. Both positions help support the implementation of ROMA statewide and at each eligible entity. The training and technical assistance position is responsible for coordinating ROMA trainings and meetings for the network. The system administrator position is responsible for assisting the eligible entities to be compliant with ROMA in regard to data entry and reporting. The Nebraska State CSBG Office also encourages each eligible entity to have a data coordinator or agency data administrator. The system administrator at CAN holds monthly meetings with each agency's data coordinator/administrator. The purpose of these meetings is to discuss data quality, best practices, system changes, report requests, ROMA requirements, etc. The Nebraska State CSBG Office is an active participant in Nebraska's ROMA Taskforce. This taskforce includes Nebraska State CSBG Office Staff, eligible entity staff, and CAN Staff. The ROMA Taskforce meets during the year to review ROMA requirements and discuss best practices among eligible entities. The Nebraska State CSBG Office also utilizes federal partners and other states to obtain and provide further guidance and best practices to the Nebraska Community Action Network. Eligible entities are also expected to employ an administrator to oversee ROMA implementation.

13.4. Eligible Entity Use of Data:

Describe how the state plan to validate the eligible entities that are using data to improve service delivery?

Note: This response will also link to the corresponding assurance, Item 14.12.

The Nebraska State CSBG Office includes this question in the CSBG Community Action Plan. Eligible entities are required to provide a narrative explaining how they used their community needs assessment and other data collected to determine its programming. The Nebraska State CSBG Office plans to discuss best practices for using data to guide services and improve service delivery with eligible entity staff throughout the year. The Nebraska State CSBG Office plans to focus on data analysis regarding community needs assessments and communicating outcomes during FFY 2025 and 2026. The Nebraska State CSBG Office plans to support the system administrator at CAN to host trainings to ensure that the eligible entities can successfully analyze their data, but also utilize this data effectively to guide services and improve service delivery.

Community Action Plans and Needs Assessments
13.5. Community Action Plan: Describe how the state will secure a Community Action Plan from each eligible entity, as a condition of receipt of CSBG funding by each entity, as required by Section 676(b)(11) of the CSBG Act.
<i>Note: this response will link to the corresponding assurance, Item 14.11.</i>
The Nebraska State CSBG Office requires each agency to submit Module 4 with estimated target numbers, as well as a CSBG Community Action Plan. The CSBG Community Action Plan includes questions based on the CSBG State Plan, the CSBG Act, the CSBG Organizational Standards, the State of Nebraska Community Services Block Grant Program Policy Manual, and the CSBG subaward agreement. Documents are to be submitted by the deadline set by the Nebraska State CSBG Office. Documents are reviewed by the Nebraska State CSBG Office and the state association.
13.6. Community Needs Assessment: Describe how the State will assure that each eligible entity includes a community needs assessment for the community served (which may be coordinated with community needs assessments conducted by other programs) in each entity's Community Action Plan, as required by Section 676(b)(11) of the CSBG Act.
<i>Note: this response will link to the corresponding assurance, Item 14.11.</i>
The Nebraska State CSBG Office incorporates information regarding this into the CSBG Community Action Plan. Agencies are required to provide a narrative explaining how they used their community needs assessment and other data collected to determine its programming. The Nebraska State CSBG Office also plans to further discuss with eligible entities best practices in using their community needs assessment as identified in the CSBG Act. Language is included in the CSBG subawards and the State of Nebraska Community Services Block Grant Program Policy Manual explaining that full community needs assessments must be completed every three (3) years and that annual updates can be completed in the years between full assessments. The Nebraska State CSBG Office also asks how services and programs are guided by the community needs assessment as part of the onsite monitoring interview questions.

Section 14: CSBG Programmatic Assurances and Information Narrative

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
Administration for Children and Families
Community Services Block Grant (CSBG)

Form Approved
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SECTION 14 CSBG Programmatic Assurance and Information Narrative (Section 676(b) of the CSBG Act)

14.1 Use of Funds Supporting Local Activities

CSBG Services

14.1a. 676(b)(1)(A): Describe how the state will assure "that funds made available through grant or allotment will be used -

(A) to support activities that are designed to assist low-income families and individuals, including families and individuals receiving assistance under title IV of the Social Security Act, homeless families and individuals, migrant or seasonal farm workers, and elderly low-income individuals and families, and a description of how such activities will enable the families and individuals--

- (i) to remove obstacles and solve problems that block the achievement of self sufficiency (particularly for families and individuals who are attempting to transition off a State program carried out under part A of title IV of the Social Security Act);
- (ii) to secure and retain meaningful employment;
- (iii) to attain an adequate education with particular attention toward improving literacy skills of the low-income families in the community, which may include family literacy initiatives;
- (iv) to make better use of available income;
- (v) to obtain and maintain adequate housing and a suitable living environment;
- (vi) to obtain emergency assistance through loans, grants, or other means to meet immediate and urgent individual and family needs;
- (vii) to 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 -
 - (I) document best practices based on successful grassroots intervention in urban areas, to develop methodologies for widespread replication; and
 - (II) strengthen and improve relationships with local law enforcement agencies, which may include participation in activities such as neighborhood or community policing efforts;

The Nebraska State CSBG Office incorporates information regarding this into the CSBG Community Action Plan. Eligible entities are required to provide a narrative explaining how they plan to meet these assurances. The Nebraska State CSBG Office also plans to further discuss the eligible entities programs that will meet these required assurances. The Nebraska State CSBG Office has included questions regarding these assurances in the onsite monitoring interviews. The State of Nebraska Community Services Block Grant Program Policy Manual and subaward agreements also include language stating that these assurances are required to be met by all eligible entities.

Needs of Youth

14.1b. 676(b)(1)(B) Describe how the state will assure "that funds made available through grant or allotment will be used -

(B) 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, and 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--

- (i) programs for the establishment of violence-free zones that would involve youth development and intervention models (such as models involving youth mediation, youth mentoring, life skills training, job creation, and entrepreneurship programs); and
- (ii) after-school child care programs;

The Nebraska State CSBG Office incorporates information regarding this into the CSBG Community Action Plan. Eligible entities are required to provide a narrative explaining how they plan to meet these assurances. The Nebraska State CSBG Office also plans to further discuss the eligible entities programs that will meet these required assurances. The State of Nebraska Community Services Block Grant Program Policy Manual and subaward agreements also include language stating that these assurances are required to be met by all eligible entities. Eight (8) of the nine (9) eligible entities operate Head Start and/or Early Head Start programs. The other eligible entity is developing a youth school program.

Coordination of Other Programs

14.1c. 676(b)(1)(C) Describe how the state will assure "that funds made available through grant or allotment will be used -

(C) to make more effective use of, and to coordinate with, other programs related to the purposes of this subtitle (including state welfare reform efforts)

The Nebraska State CSBG Office incorporates information regarding this into the CSBG Community Action Plan. Eligible entities are required to provide a narrative explaining how they plan to meet these assurances. The Nebraska State CSBG Office also plans to further discuss the eligible entities programs that will meet these required assurances. The Nebraska State CSBG Office has included questions regarding the coordination of programs and other funding sources in the onsite monitoring interviews. Since Nebraska-eligible entities primarily utilize CSBG funding for staff and infrastructure

support, it is imperative for eligible entities to have other program funds (private or public) to meet client needs.
State Use of Discretionary Funds
14.2 676(b)(2) Describe "how the state intends to use discretionary funds made available from the remainder of the grant or allotment described in section 675C(b) in accordance with this subtitle, including a description of how the state will support innovative community and neighborhood-based initiatives related to the purposes of this subtitle."
<i>Note: The State describes this assurance under "State Use of Funds: Remainder/Discretionary," items 7.9 and 7.10</i>
Eligible Entity Service Delivery, Coordination, and Innovation
14.3. 676(b)(3) "Based on information provided by eligible entities in the state, a description of..."
14.3a. 676(b)(3)(A) Describe "the service delivery system, for services provided or coordinated with funds made available through grants made under 675C(a), targeted to low-income individuals and families in communities within the state;"
The Nebraska State CSBG Office requires each agency to submit annually a CSBG Community Action Plan. This plan includes the Community Needs Assessment, plans for the next year, the partners and programs of the entity, Module 3 (if completing), Module 4, and a budget. After the Nebraska State CSBG Office reviews these applications, a call is completed with each entity's executive director to discuss the content of their plan. One of the focuses of the conversation is to inquire about the entity's service delivery practices. Entities in Nebraska have some programs and services that are one-time services; however, they also have some programs and services that are delivered through case management. The Nebraska Community Action Network recognizes that outcomes are more easily tracked and reached through case management, so this is always the goal with entities.
Eligible Entity Linkages - Approach to Filling Service Gaps
14.3b. 676(b)(3)(B) Describe "how linkages will be developed to fill identified gaps in the services, through the provision of information, referrals, case management, and followup consultations."
<i>Note: The state describes this assurance in the state linkages and communication section, item 9.3b.</i>
The Nebraska State CSBG Office incorporates information regarding this into the CSBG Community Action Plan. Eligible entities are required to complete a narrative explaining how the agency plans to coordinate and establish linkages to assure the effective delivery of and coordination of CSBG services to low-income people and communities, as well as avoid duplication of services. The Nebraska State CSBG Office also plans to further discuss the progress and impact of the linkages with staff from the eligible entities, as well as to determine if there is any need for support from the Nebraska State CSBG Office. Linkages and coordination are an area that is reviewed during the on-site monitoring review process. The Nebraska State CSBG Office asks several questions regarding partnerships within the community, referral processes, involvement in community meetings focused on coordinating services, creating programs jointly with other organizations, etc.
Coordination of Eligible Entity Allocation 90 Percent Funds with Public/Private Resources
14.3c. 676(b)(3)(C) Describe how funds made available through grants made under 675C(a) will be coordinated with other public and private resources."
<i>Note: The state describes this assurance in the state linkages and communication section, item 9.7.</i>
The Nebraska State CSBG Office incorporates information regarding this into the CSBG Community Action Plan. Eligible entities are required to complete a narrative explaining the coordination of CSBG funds with other public and private resources. The Nebraska State CSBG Office plans to discuss the coordination of funds with public and private resources with staff from the eligible entities. The Nebraska State CSBG Office also asks questions regarding resources and fund development during the onsite monitoring review process.
Eligible Entity Innovative Community and Neighborhood Initiatives, Including Fatherhood/Parental Responsibility
14.3d. 676(b)(3)(D) Describe "how the local entity will use the funds [made available under Section 675C(a)] to support innovative community and neighborhood-based initiatives related to the purposes of this subtitle, which may include fatherhood initiatives and other initiatives with the goal of strengthening families and encouraging parenting."
<i>Note: The description above is about eligible entity use of 90 percent funds to support these initiatives. States may also support these types of activities at the local level using State remainder/discretionary funds, allowable under Section 675C(b)(1)(F). In this State Plan, the State indicates funds allocated for these activities under item 7.9(f).</i>
At this time, no eligible entity has a specific fatherhood initiative. However, some eligible entities are conducting programs around parental responsibility. Head Start and Early Head Start have strong programs encouraging parental involvement and strengthening families. Each eligible entity will address strengthening families and encouraging parenting if there is an issue that arises in client discussions. Since the eligible entities utilize a case management model, the client determines goals. If that goal includes parenting, the eligible entity will work with the client to receive these services or complete necessary referrals if the services needed are not offered by the eligible entity.
Eligible Entity Emergency Food and Nutrition Services
14.4. 676(b)(4) Describe how the state will assure "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."
The Nebraska State CSBG Office incorporates information regarding this into the CSBG Community Action Plan. Eligible entities are required to provide a narrative explaining how they plan to provide emergency supplies and services, nutritious foods, and related services. The Nebraska State CSBG Office also plans to further discuss the eligible entity's programs and services provided to meet this assurance. The Nebraska State CSBG Office has included questions regarding these assurances in the onsite monitoring interviews. The State of Nebraska Community Services Block Grant Program Policy Manual and subaward agreements also include language stating that these assurances are required to be met by all eligible entities. All Nebraska eligible entities currently have programs and services to meet the need of food insecurity. These programs and services include: food pantries,

partnerships with state or local businesses to distribute food, backpack programs for weekend food needs, meal services, and meal delivery programs.

State and Eligible Entity Coordination/linkages and Workforce Innovation and Opportunity Act Employment and Training Activities

14.5. 676(b)(5) Describe how the state will assure "that the state and 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, and [describe] how the State and the eligible entities will coordinate the provision of employment and training activities, as defined in section 3 of the Workforce Innovation and Opportunity Act, in the state and in communities with entities providing activities through statewide and local workforce development systems under such Act."

Note: The state describes this assurance in the state linkages and communication section, items 9.1, 9.2, 9.3a, 9.4, 9.4a, and 9.4b.

State Coordination/Linkages and Low-income Home Energy Assistance

14.6. 676(b)(6) Provide "an assurance that the state will ensure coordination between antipoverty 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 community."

Note: The state describes this assurance in the state linkages and communication section, items 9.2 and 9.5.

Federal Investigations

14.7. 676(b)(7) Provide "an assurance that the state will permit and cooperate with Federal investigations undertaken in accordance with section 678D." Yes

Note: The state addresses this assurance in the Fiscal Controls and Monitoring section, item 10.13.

Funding Reduction or Termination

14.8. 676(b)(8) Provide "an assurance that any eligible entity in the state that received funding in the previous fiscal year through a community services block grant made under this subtitle will not have its funding terminated under this subtitle, 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 678C(b)." Yes

Note: The state addresses this assurance in the Fiscal Controls and Monitoring section, item 10.7.

Coordination with Faith-based Organizations, Charitable Groups, Community Organizations

14.9. 676(b)(9) Describe how the state will assure "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."

Note: The state describes this assurance in the state Linkages and Communication section, item 9.6.

Eligible Entity Tripartite Board Representation

14.10. 676(b)(10) Describe how "the state will 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."

Note: The state describes this assurance in the Eligible Entity Tripartite Board section, 11.3.

This requirement is included in the State of Nebraska Community Services Block Grant Program Policy Manual. All eligible entities are required to follow the State of Nebraska Community Services Block Grant Program Policy Manual, as set forth in their subaward agreements. The Nebraska State CSBG Office has also integrated this assurance into the onsite monitoring review. The Nebraska State CSBG Office reviews an entity's policies, procedures, and bylaws prior to the onsite review. While the Nebraska State CSBG Office is onsite, an interview is conducted with the executive director/chief executive officer regarding board governance. One of the questions included in the board governance interview is regarding the eligible entity's process for allowing individuals or organizations to petition for adequate representation on the tripartite board.

Eligible Entity Community Action Plans and Community Needs Assessments

14.11. 676(b)(11) Provide "an assurance that the state will secure from each eligible entity in the services block grant made under this subtitle for a program, 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 assessments conducted for other programs."

Note: The state describes this assurance in the ROMA section, items 13.5 and 13.6.

State and Eligible Entity Performance Measurement: ROMA or Alternate system

14.12. 676(b)(12) Provide "an assurance 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 System, another performance measure system for which the Secretary facilitated development pursuant to 678E(b), or an alternative system for measuring performance and results that meets the requirements of that section, and [describe] outcome measures to be used to measure eligible entity performance in promoting self-sufficiency, family stability, and community revitalization."

Note: The state describes this assurance in the ROMA section, items 13.1, 13.2, 13.3, and 13.4.

Validation for CSBG Eligible Entity Programmatic Narrative Sections
14.13. 676(b)(13) Provide "information describing how the state will carry out the assurances described in this section."
<i>Note: The state provides information for each of the assurances directly in section 14 or in corresponding items throughout the State Plan, which are included as hyperlinks in section 14.</i>
<input checked="checked" type="checkbox"/> By checking this box, the state CSBG authorized official is certifying the assurances set out above.

Section 15: Federal Certifications

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
Administration for Children and Families
Community Services Block Grant (CSBG)

Form Approved
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SECTION 15 Federal Certifications

15.1. CERTIFICATION REGARDING LOBBYING

Certification for Contracts, Grants, Loans, and Cooperative Agreements

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Statement for Loan Guarantees and Loan Insurance

The undersigned states, to the best of his or her knowledge and belief, that:

If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

The box after each certification must be checked by the state CSBG authorized official.

15.1. Lobbying

After assurance select a check box:



By checking this box, the state CSBG authorized official is providing the certification set out above.

15.2. CERTIFICATION REGARDING DRUG-FREE WORKPLACE REQUIREMENTS

This certification is required by the regulations implementing the Drug-Free Workplace Act of 1988: 45 CFR Part 76, Subpart, F. Sections 76.630(c) and (d)(2) and 76.645 (a)(1) and (b) provide that a Federal agency may designate a central receipt point for STATE-WIDE AND STATE AGENCY-WIDE certifications, and for notification of criminal drug convictions. For the Department of Health and Human Services, the central point is: Division of Grants Management and Oversight, Office of Management and Acquisition, Department of Health and Human Services, Room 517-D, 200 Independence Avenue, SW Washington, DC 20201.

Certification Regarding Drug-Free Workplace Requirements (Instructions for Certification)

1. By signing and/or submitting this application or grant agreement, the grantee is providing the certification set out below.
2. The certification set out below is a material representation of fact upon which reliance is placed when the agency awards the grant. If it is later determined that the grantee knowingly rendered a false certification, or otherwise violates the requirements of the Drug-Free Workplace Act, the agency, in addition to any other remedies available to the Federal Government, may take action authorized under the Drug-Free Workplace Act.
3. For grantees other than individuals, Alternate I applies.
4. For grantees who are individuals, Alternate II applies.
5. Workplaces under grants, for grantees other than individuals, need to be identified on the certification. If known, they may be identified in the grant application. If the grantee does not identify the workplaces at the time of application, or upon award, if there is no application, the grantee must keep the identity of the workplace(s) on file in its office and make the information available for Federal inspection. Failure to identify all known workplaces constitutes a violation of the grantee's drug-free workplace requirements.
6. Workplace identifications must include the actual address of buildings (or parts of buildings) or other sites where work under the grant takes place. Categorical descriptions may be used (e.g., all vehicles of a mass transit authority or state highway department while in operation, state employees in each local unemployment office, performers in concert halls or radio studios).
7. If the workplace identified to the agency changes during the performance of the grant, the grantee shall inform the agency of the change(s), if it previously identified the workplaces in question (see paragraph five).
8. Definitions of terms in the Nonprocurement Suspension and Debarment common rule and Drug-Free Workplace common rule apply to this certification. Grantees' attention is called, in particular, to the following definitions from these rules:

Controlled substance means a controlled substance in Schedules I through V of the Controlled Substances Act (21 U.S.C. 812) and as further defined by regulation (21 CFR 1308.11 through 1308.15);.

Conviction means a finding of guilt (including a plea of nolo contendere) or imposition of sentence, or both, by any judicial body charged with the responsibility to determine violations of the federal or state criminal drug statutes;

Criminal drug statute means a Federal or non-Federal criminal statute involving the manufacture, distribution, dispensing, use, or possession of any controlled substance;

Employee means the employee of a grantee directly engaged in the performance of work under a grant, including: (i) All direct charge employees; (ii) All indirect charge employees unless their impact or involvement is insignificant to the performance of the grant; and, (iii) Temporary personnel and consultants who are directly engaged in the performance of work under the grant

and who are on the grantee's payroll. This definition does not include workers not on the payroll of the grantee (e.g., volunteers, even if used to meet a matching requirement; consultants or independent contractors not on the grantee's payroll; or employees of subrecipients or subcontractors in covered workplaces).

Certification Regarding Drug-Free Workplace Requirements

Alternate I. (Grantees Other Than Individuals)

The grantee certifies that it will or will continue to provide a drug-free workplace by:

(a) Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;

(b) Establishing an ongoing drug-free awareness program to inform employees about--

(1) The dangers of drug abuse in the workplace;

(2) The grantee's policy of maintaining a drug-free workplace;

(3) Any available drug counseling, rehabilitation, and employee assistance programs; and

(4) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;

(c) Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph (a);

(d) Notifying the employee in the statement required by paragraph (a) that, as a condition of employment under the grant, the employee will - -

(1) Abide by the terms of the statement; and (2) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;

(e) Notifying the agency in writing, within 10 calendar days after receiving notice under paragraph (d)(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;

(f) Taking one of the following actions, within 30 calendar days of receiving notice under paragraph (d)(2), with respect to any employee who is so convicted - -

(1) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or

(2) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a federal, state, or local health, law enforcement, or other appropriate agency;

(g) Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs (a), (b), (c), (d), (e) and (f).

The grantee may insert in the space provided below the site(s) for the performance of work done in connection with the specific grant:

Place of Performance (Street address, city, county, state, zip code)

Check if there are workplaces on file that are not identified here.

Alternate II. (Grantees Who Are Individuals)

(a)The grantee certifies that, as a condition of the grant, he or she will not engage in the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance in conducting any activity with the grant;

(b)If convicted of a criminal drug offense resulting from a violation occurring during the conduct of any grant activity, he or she will report the conviction, in writing, within 10 calendar days of the conviction, to every grant officer or other designee, unless the Federal agency designates a central point for the receipt of such notices. When notice is made to such a central point, it shall include the identification number(s) of each affected grant.

[55 FR 21690, 21702, May 25, 1990]

15.2. Drug-Free Workplace Requirements

After assurance select a check box:



By checking this box, the state CSBG authorized official is providing the certification set out above.

15.3. CERTIFICATION REGARDING DEBARMENT, SUSPENSION AND OTHER RESPONSIBILITY MATTERS

Certification Regarding Debarment, Suspension, and Other Responsibility Matters - - Primary Covered Transactions

Instructions for Certification

1. By signing and submitting this proposal, the prospective primary participant is providing the certification set out below.

2. The inability of a person to provide the certification required below will not necessarily result in denial of participation in this covered transaction. The prospective participant shall submit an explanation of why it cannot provide the certification set out below. The certification or explanation will be considered in connection with the department or agency's determination whether to enter into this transaction. However, failure of the prospective primary participant to furnish a certification or an explanation shall disqualify such person from participation in this transaction.

3. The certification in this clause is a material representation of fact upon which reliance was placed when the department or agency determined to enter into this transaction. If it is later determined that the prospective primary participant knowingly rendered an erroneous certification, in addition to other remedies available to the Federal Government, the department or agency may terminate this transaction for cause or default.

4. The prospective primary participant shall provide immediate written notice to the department or agency to which this proposal is submitted if at any time the prospective primary participant learns that its certification was erroneous when submitted or has become erroneous by reason of changed circumstances.

5. The terms covered transaction, debarred, suspended, ineligible, lower tier covered transaction, participant, person, primary covered transaction, principal, proposal, and voluntarily excluded, as used in this clause, have the meanings set out in the Definitions and Coverage sections of the rules implementing Executive Order 12549. You may contact the department or agency to which this proposal is being submitted for assistance in obtaining a copy of those regulations.

6. The prospective primary participant agrees by submitting this proposal that, should the proposed covered transaction be entered into, it shall not knowingly

enter into any lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, declared ineligible, or voluntarily excluded from participation in this covered transaction, unless authorized by the department or agency entering into this transaction.

7. The prospective primary participant further agrees by submitting this proposal that it will include the clause titled "Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusive-Lower Tier Covered Transaction," provided by the department or agency entering into this covered transaction, without modification, in all lower tier covered transactions and in all solicitations for lower tier covered transactions

8. A participant in a covered transaction may rely upon a certification of a prospective participant in a lower tier covered transaction that is not proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, ineligible, or voluntarily excluded from the covered transaction, unless it knows that the certification is erroneous. A participant may decide the method and frequency by which it determines the eligibility of its principals. Each participant may, but is not required to, check the List of Parties Excluded from Federal Procurement and Nonprocurement Programs.

9. Nothing contained in the foregoing shall be construed to require establishment of a system of records in order to render in good faith the certification required by this clause. The knowledge and information of a participant is not required to exceed that which is normally possessed by a prudent person in the ordinary course of business dealings.

10. Except for transactions authorized under paragraph 6 of these instructions, if a participant in a covered transaction knowingly enters into a lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, suspended, debarred, ineligible, or voluntarily excluded from participation in this transaction, in addition to other remedies available to the Federal Government, the department or agency may terminate this transaction for cause or default.

Certification Regarding Debarment, Suspension, and Other Responsibility Matters - - Primary Covered Transactions

(1) The prospective primary participant certifies to the best of its knowledge and belief, that it and its principals:

(a) Are not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded by any Federal department or agency;

(b) Have not within a three-year period preceding this proposal been convicted of or had a civil judgment rendered against them for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public (Federal, state or local) transaction or contract under a public transaction; violation of federal or state antitrust statutes or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, or receiving stolen property;

(c) Are not presently indicted for or otherwise criminally or civilly charged by a governmental entity (federal, state or local) with commission of any of the offenses enumerated in paragraph (1)(b) of this certification; and

(d) Have not within a three-year period preceding this application/proposal had one or more public transactions (federal, state or local) terminated for cause or default.

(2) Where the prospective primary participant is unable to certify to any of the

statements in this certification, such prospective participant shall attach an explanation to this proposal.

**Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion - -
Lower Tier Covered Transactions**

Instructions for Certification

1. By signing and submitting this proposal, the prospective lower tier participant is providing the certification set out below

2. The certification in this clause is a material representation of fact upon which reliance was placed when this transaction was entered into. If it is later determined that the prospective lower tier participant knowingly rendered an erroneous certification, in addition to other

3. The prospective lower tier participant shall provide immediate written notice to the person to which this proposal is submitted if at any time the prospective lower tier participant learns that its certification was erroneous when submitted or had become erroneous by reason of changed circumstances.

4. The terms covered transaction, debarred, suspended, ineligible, lower tier covered transaction, participant, person, primary covered transaction, principal, proposal, and voluntarily excluded, as used in this clause, have the meaning set out in the Definitions and Coverage sections of rules implementing Executive Order 12549. You may contact the person to which this proposal is submitted for assistance in obtaining a copy of those regulations.

5. The prospective lower tier participant agrees by submitting this proposal that, should the proposed covered transaction be entered into, it shall not knowingly enter into any lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, declared ineligible, or voluntarily excluded from participation in this covered transaction, unless authorized by the department or agency with which this transaction originated.

6. The prospective lower tier participant further agrees by submitting this proposal that it will include this clause titled "Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion-Lower Tier Covered Transaction," without modification, in all lower tier covered transactions and in all solicitations for lower tier covered transactions.

7. A participant in a covered transaction may rely upon a certification of a prospective participant in a lower tier covered transaction that it is not proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, ineligible, or voluntarily excluded from covered transactions, unless it knows that the certification is erroneous. A participant may decide the method and frequency by which it determines the eligibility of its principals. Each participant may, but is not required to, check the List of Parties Excluded from Federal Procurement and Nonprocurement Programs.

8. Nothing contained in the foregoing shall be construed to require establishment of a system of records in order to render in good faith the certification required by this clause. The knowledge and information of a participant is not required to exceed that which is normally possessed by a prudent person in the ordinary course of business dealings.

9. Except for transactions authorized under paragraph five of these instructions, if a participant in a covered transaction knowingly enters into a lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, suspended, debarred, ineligible, or voluntarily excluded from

participation in this transaction, in addition to other remedies available to the Federal Government, the department or agency with which this transaction originated may pursue available remedies, including suspension and/or debarment.

Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion - - Lower Tier Covered Transactions

(1) The prospective lower tier participant certifies, by submission of this proposal, that neither it nor its principals is presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from participation in this transaction by any Federal department or agency.

(2) Where the prospective lower tier participant is unable to certify to any of the statements in this certification, such prospective participant shall attach an explanation to this proposal.

15.3. Debarment

After assurance select a check box:



By checking this box, the state CSBG authorized official is providing the certification set out above.

15.4. CERTIFICATION REGARDING ENVIRONMENTAL TOBACCO SMOKE

Public Law 103227, Part C Environmental Tobacco Smoke, also known as the Pro Children Act of 1994, requires that smoking not be permitted in any portion of any indoor routinely owned or leased or contracted for by an entity and used routinely or regularly for provision of health, day care, education, or library services to children under the age of 18, if the services are funded by Federal programs either directly or through state or local governments, by Federal grant, contract, loan, or loan guarantee. The law does not apply to children's services provided in private residences, facilities funded solely by Medicare or Medicaid funds, and portions of facilities used for inpatient drug or alcohol treatment. Failure to comply with the provisions of the law may result in the imposition of a civil monetary penalty of up to \$1000 per day and/or the imposition of an administrative compliance order on the responsible entity by signing and submitting this application the applicant/grantee certifies that it will comply with the requirements of the Act.

The applicant/grantee further agrees that it will require the language of this certification be included in any subawards which contain provisions for the children's services and that all subgrantees shall certify accordingly.

15.4. Environmental Tobacco Smoke

After assurance select a check box:



By checking this box, the state CSBG authorized official is providing the certification set out above.

THE PAPERWORK REDUCTION ACT OF 1995 (Pub. L. 104-13)

Public reporting burden for this collection of information is estimated to average 10 hours per response, including the time for reviewing instructions, gathering and maintaining the data needed, and reviewing the collection of information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.