



Community Service Block Grant 2025 Request for Applications

Published December 2024



OKLAHOMA
Commerce

Table of Contents

Authority and Scope	2
Background and Purpose	2
Income Eligibility Requirements for Direct Client Services	2
Tripartite Board	2
Funding	3
CSBG Contract Period	3
Submittal Due Date Information	3
SAMS.gov	3
Training and Technical Assistance	3
Discretionary Projects	3
Performance Measurements	4
Reporting Requirements	5
Accountability	6
Monitoring	6
Implementation Manual	6
Organizational Standards	6
ROMA Implementation	6
Public Law 103-227, Part C. Environmental Tobacco Smoke	7
Application Requirements	
Community Needs Assessment Summary	8
Budget	8
Tripartite Boards	10
Agency Organization Chart	10
Primary Contact Information	10
Submission Checklist	11
Attachments List	12

What's New:

Nothing significant. The wording of some sections has been updated, but the meaning has not.

You must hold the Ctrl key down and click on the hyperlinks within this document.

**Oklahoma Department of Commerce
Community Services Block Grant (CSBG)
Request for Application (RFA)**

Authority and Scope:

This program is authorized under the Community Services Block Grant Act, 42 U.S.C. Sections 9901 et seq. The legal authority to implement the program is vested in The Oklahoma Department of Commerce (ODOC) pursuant to 74 O.S. Section 5003.6

Funding applications are requested from eligible entities known as Community Action Agencies to carry out the Community Services Block Grant requirements.

Background and Purpose:

Since its inception, the CSBG program has provided state and local agencies with funds to support efforts to reduce poverty, revitalize low-income communities, and lead to self-sufficiency among low-income families and individuals. CSBG dates back to the War on Poverty of the 1960s and 1970s, which established the Community Action program, under which the nationwide network of local community action agencies was developed.

Income Eligibility Requirements for Direct Client Services:

Eligible entities should use the most current HHS poverty guidelines when assessing income eligibility. The current guidelines are published in the Federal Register and are available on the HHS website, www.hhs.gov.

The federal Office of Management and Budget (OMB) determines the federal poverty line based on the most recent federal Census data. The U.S. Department of Health and Human Services (HHS poverty guidelines) revises it annually (or more frequently).

Consistent with its most recent community needs assessment, an eligible entity may prioritize providing CSBG services/benefits to clients of lower income levels within the state's CSBG income eligibility limit.

Tripartite Board:

Sections 676B of the Community Services Block Grant Reauthorization Act of 1998 requires that, as a condition of designation, private nonprofit entities and public organizations administer their CSBG program through tripartite boards that “fully participate in the development, planning, implementation, and evaluation of the program that serve low-income communities”

Funding:

The funded amount an eligible entity receives is based on a formula based on census data on the poverty population, elderly population, and total square miles of the eligible entity's service area. In addition, each agency receives a base amount of \$10,000 per county annually. Funds are distributed when our office receives a Notification of Award from the Department of Health and Human Services. Three (3) or four (4) awards are typically made throughout the contract period.

CSBG Contract Period:

CSBG 2025 Funding will cover the period of **January 1, 2025**, through **September 30, 2026**.

Submittal and Due Date Information:

Applications are to be submitted through [Grants.ok.gov](https://www.okgrants.com) (OKGrants). The application includes the Applicant Information, budget, and audit forms. Other required documents described in this RFA should be submitted as an upload to the application. An upload section is included in the submission forms within OKGrants. **The due date for application submission in OKGrants is March 30, 2025.** (Note: Audit documents are now submitted through the "My Financials" tab in OKGrants.)

SAM.Gov

2 CFR 215.13 requires that no sub-award or contract be made with certain parties debarred, suspended, or otherwise excluded from or ineligible for participation in Federal programs or activities.

To comply with this requirement, ODOC will ensure the applicant has no [SAM.gov](https://www.sam.gov) exclusions before the award.

Training and Technical Assistance:

For instructions on requesting training or technical assistance, see Requirement 110 in the Community Action Agency Implementation Manual.

Discretionary Projects:

States may use 5% of the CSBG allotment for the following:

- Support innovative State and local projects that reduce poverty, promote self-sufficiency, and promote community revitalization.
- Capacity building programs and professional development efforts targeted toward eligible entities.
- Training and technical assistance to eligible entities in need of assistance.
- Analysis of the distribution of funds to determine if such funds have been targeted to areas of greatest need.

Community Action Agencies may contact the State office for additional information.

Primary areas of program focus: Performance Measurements, Reporting, Accountability, Monitoring, Training and Technical Assistance.

Performance Measurements:

The CSBG Act *requires* state and local agencies to participate in a performance measurement system. Results Oriented Management and Accountability (ROMA) is a tool by which States and Community Action can maintain strong and effective programs that achieve the three National Goals.

Individual and Family Goal:

Goal 1: Individuals and Families with low incomes are stable and achieve economic security.

Community Goals:

Goal 2: Communities where people with low incomes live are healthy and offer economic opportunity.

Goal 3: People with low incomes are engaged and active in building opportunities in communities.

The ROMA concept must be applied to all agency programs, not just those supported by CSBG. Therefore, data must be collected that substantiates the outcomes of **all** CAA programs.

The Oklahoma Department of Commerce utilizes data collected in the CAPTAIN online data management system, paper reports, and the Annual Report to substantiate CSBG's impact on the lives of low-income Oklahomans.

National Community Action Theory of Change

A Theory of Change (TOC) is the articulation of underlying beliefs and assumptions that guide selection of service delivery strategies that are critical for producing change and improvement. It is a framework which addresses the systems and activities that support the outcomes to be accomplished.

Defining the work of the Community Action Network in such a theory-based framework can help to identify the links that connect the purpose of the network, the understanding of the network's national system, and the actual strategies implemented by local Community Action Agencies (CAA). Creating this clear link requires articulation of ideas about the best approaches for selection of programs and reasons to expect certain solutions.

Logic Models and Local Agency Theory of Change

Logic models, as they are used in ROMA, are about program management and accountability. They are limited, either to specific needs that may include multiple services, outcomes and indicators, or to specific services that may have multiple outcomes and indicators. But they generally do not address the "big picture" of an entire agency or the multiple needs of a community or target population well-being.

The process of creating a local agency Theory of Change (TOC) is a process of thinking about how the agency is supposed to work and what is supposed to change because of

their work. The TOC thinking process essentially answers the question “How will this agency affect the movement of people with low incomes to stability and economic security?” and also, “How will it affect the well-being of the community?”

Additionally, in a local TOC, the agency’s own needs, outcomes and strategies should be included. In the National TOC, agency capacity building is considered to be a strategy to assure that local agencies have the means to help individuals, families and communities meet the National Goals. The foundational statement and performance management framework in the National TOC reference the systems in place to support agency capacity building (e.g. a national network and the Organizational Standards). At the local level, the focus must include building, increasing and maintaining agency capacity. As agencies consider doing more community level strategies and/or more than just what they have a specific grant to fund, this may reveal issues of agency capacity that need to be addressed. Agencies will clearly articulate how they identify needs, what outcomes they expect to achieve and what strategies will produce the outcomes. They will also identify indicators and measures that will allow them to observe and report progress.

For more information on annual report reporting requirements and the National and Local Agency Theory of Change, review OCS [IM 152](#).

Reporting Requirements:

ODOC requires that **all** programs administered by the agency be reported in the Community Action Program Total Automated Information Network (CAPTAIN) online data management system. In unique situations with written approval from ODOC, paper reporting is allowable if a comparable reporting system can be demonstrated as an option to the State Supported Reporting System (CAPTAIN).

CAPTAIN must be maintained and updated regularly, but no later than the 20th of the month after the reported month. Paper reports must be received at ODOC quarterly (April 20, 2025; July 20, 2025; October 20, 2025; and a final cumulative report by January 20, 2026).

CAP Systems, the CAPTAIN On-line Data Management System provider, provides users with regular training and technical assistance. *Except for Contractors approved to paper report*, the Contractor shall ensure that appropriate staff **actively participate** in at least 5 hours of CAP Systems training and technical assistance per calendar year and will provide a compliance statement at contract close-out. This requirement is met by system users participating in training and technical assistance calls/webinars.

Participation in system demonstrations or meetings for pilot projects is not considered training or technical assistance.

Accountability:

In accordance with [2 CFR](#), eligible entities must ensure that internal control standards are established to ensure efficient and effective operations, reliable financial reporting, and compliance with state and federal regulations. The membership of the Tripartite Board is and will remain constituted in compliance with CSBG requirements. (42 USC 9910).

Monitoring:

Federal guidelines require that ODOC monitor its sub-recipient programs at least once every three years. ODOC policies provide for monitoring in accordance with the federal requirement. Monitoring will include reviewing the agencies' administrative procedures, financial management systems, performance results, and other funding source monitoring evaluations. The Oklahoma Department of Commerce (ODOC) is vested in the agency's overall health. It uses both on-site and desktop monitoring as a tool to provide recommendations for continued progress or improvement and to build the agency's capacity to achieve results.

Follow-up reviews will be conducted when an agency fails to meet the goals, standards, and requirements established by state and Federal authorities.

The Subgrantee Recipient may appeal any ODOC monitoring finding or ODOC decision by following procedures outlined in Oklahoma Administrative Code, Title 150, Chapter 1, subchapter 11.

Implementation Manual:

The Contractor shall maintain records and accounts that properly document and account for all project funds, including property, personnel, and financial records. ODOC's Contractor's Implementation Manual requires specific types and forms of records. The Manual is annexed, incorporated, and made part of this contract. The manual may be amended during the current contract year by ODOC. [Community Services Block Grant Programs | Oklahoma Department of Commerce \(okcommerce.gov\)](#)

Organizational Standards:

Following IM138, ODOC will annually assess each agency's standards status. Agencies must regularly maintain the Organizational Standards module of the CAP Systems online data management system to document compliance with the standards. ODOC will validate the results through desktop monitoring and on-site monitoring visits. While we strive to avoid uploading documents more than once, upon review, additional documentation clarification may be requested, and additional uploads may be required. Tool kits for all the standards are located [here](#).

ROMA Implementation:

As required under Section 678E(a)(1)(A) of the CSBG Act, ODOC shall participate and shall ensure that all eligible entities in the State participate in a performance measurement system.

ROMA incorporates the use of outcomes or results into the administration, management, and operation of community action agencies. Continuous use of the full cycle is necessary to comply with the CSBG Act and certain organizational standards.

Public Law 103-227, Part C. Environmental Tobacco Smoke:

As a condition of funding, applicants must certify compliance with Public Law 103-227, Part C. Environmental Tobacco Smoke, also known as the Pro-Children Act of 1994 which requires that smoking not be permitted in any portion of any indoor facility owned or leased or contracted by any entity and used routinely or regularly for the provision of health, childcare, education, or library services to children under the age of 18 if the services are funded by Federal programs either directly or indirectly through state or local governments by Federal grant, contract, loan, or loan guarantee.

Application Requirements

1. Community Needs Assessment Summary (CNA):

All applicants must complete a summary of the items 1-8 below.

1. What date was the assessment conducted?
2. How were surveys conducted (phone, mail, personal contact, etc.?)
3. Were low-income individuals surveyed? (*Organizational Standard 1.2*)
4. Were all five key sectors (community-based organizations, faith-based organizations, private sector, public sector, and educational institutions) surveyed? If no, explain. (*Organizational Standard 2.2*)
5. Were others surveyed?
6. Was information from the census included? Explain. (*Organizational Standard 3.2*)
7. Did low-income individuals participate in establishing priorities after completing the assessment? Explain. (*Organizational Standard 1.1*)
8. What were the results of the assessment? List the needs in priority order. For each need, indicate the need level (family, agency, or community), whether the agency will meet those needs itself or with or through partners, and the outcomes.

ODOC will make the needs assessment available to the Secretary of the U.S. Department of Health and Human Services if requested.

2. Budget (Read this section in its entirety before making budgeting decisions):

Complete the Budget Detail form and provide specific details for each budgeted category for all Administration and Program Costs. These forms are included in the online application in OKGrants.

Direct Program Costs for CSBG Budgeting. Direct program costs include expenditures on some activities with administrative qualities, including salaries and benefits of program staff and managers, equipment, training, conferences, travel, and contracts, as long as those expenses relate specifically to a particular program or activity and not to the general administration of the agency.

Administrative Costs for CSBG Budgeting. In the context of CSBG statutory reporting requirements, administrative costs are equivalent to typical indirect costs or overhead. Administrative costs refer to central executive functions that do not directly support a specific program or project but support multiple programs administered by the agency. Administrative costs relating to the general management of the agency include strategic direction, Board development, Executive Director Functions, accounting, budgeting, personnel, procurement, and legal services.

Carefully review your administrative costs to see if any of them can be tied directly to another program and can be moved to an operational costs line item.

Below are excerpts from Information Memorandum 37 that will guide your CSBG budget development. The full document can be obtained at [IM 37](#).

Administrative costs relate to the agency's general management, such as strategic direction, Board development, Executive Director functions, accounting budgeting, personnel, procurement, and legal services. These costs do not directly support a specific project or service.

Program Costs or direct costs include expenditures on some activities with administrative qualities, including salaries and benefits of program staff and managers, equipment, training, conferences, travel, and contracts, as long as those expenses relate specifically to a particular program or activity, not to the general administration of the organization.

Allowable Costs should comply with several general criteria:

- *Reasonable and necessary for performance and administration of the award.*
- *Conforming to limitations or exclusions set in the award or 2 CFR.*
- *Consistent with the uniform policies and procedures of the organization.*
- *Allocated consistently as direct or indirect in like circumstances.*
- *Following generally accepted accounting principles.*
- *Not used to match the cost-sharing or matching requirement of another federally funded program or charged as a cost to such a program.*
- *Documented adequately.*
- *Following 2 CFR.*

“CSBG funds remain subject to the standard grant policy prohibition against cost shifting”. This policy prohibits using funds from one grant award to pay for program costs instead of the funds already provided for those same costs within another current-year federal grant award. However, the policy does not prevent using funds from one grant award to pay for program costs in excess of the amounts provided for those costs in the other current year award.”

*“Specifically, CSBG funds may not be used in place of the amounts provided by another current year federal grant award for:
direct or administrative expenditures that were included as line items in that other grant award or
Costs that were included in developing the indirect cost rate.
CSBG funds can be used to pay for costs of such program activities above and beyond the levels financed by another federal grant award.”*

If indirect costs are being charged to this CSBG award, the agency must submit a copy of the rate approval document from the cognizant agency and indicate the approved rate on the Budget Detail.

Submit a copy of the current board-approved agency-wide budget. (*Organizational Standard 8.9*)

3. Tripartite Board:

Submit current Community Action Agency (CAA) Bylaws to include the following:

- Board's Policies
- Board's Procedures
- Board's Requirements
- Board's Composition
- Board's Functions
- Board Recruitment Strategies

Submit a copy of the board training plan for the 2024 program year (see attachment for required Board Training Plan Template). Board members must have been provided training on their duties and responsibilities within the past two years (*Organizational Standard 5.8*).

Organizational Standard 5.7 requires the agency to provide a structured orientation for governing board members within 6 months of their seating. ODOC Program Representatives will monitor compliance with the standard.

Submit a comprehensive description of established procedures for low-income individuals and their representatives or low-income organizations that consider themselves inadequately represented on the Board to petition for adequate representation. Have clients used the procedure? Explain. (*Organizational Standard 1.1*)

4. Agency Organization Chart:

Submit a copy of the current agency organization chart.

5. Primary Contact Information:

Provide the name, phone number, and email address of the agency's primary contact for each:

- ROMA implementation
- Organizational Standards implementation
- Organizational Standards Level 1 users
- Organizational Standards Level 2 users
- Data collection/CAPTAIN
- CSBG Annual Report submission

Submission Checklist

(Includes both on-line forms and uploaded documents)

Application Submissions Include:

1. Applicant Information (OKGrants form)
 - ✓ Use the prior year's total CSBG award amount for the requested amount.
2. Audit (OKGrants form)
3. Budget Detail (OKGrants form)
 - ✓ Only budget the amount you have award letters for.
4. Pre-Award Risk Assessment Agency Questionnaire (upload)
 - ✓ Performance Management Outcomes (PMO) spreadsheet (upload)
 - ✓ Community Action Plan (CAP) for January – December 2025 (use ODOC template and upload to OS 4.2)
5. Indirect cost rate approval from cognizant agency, if applicable (upload)
6. Current Board-approved agency-wide budget (upload)
 - ✓ No revisions – ensure current copy is in the Organizational Standards Document Management System (OS).
 - ✓ Recent revisions – Upload current approved budget.
7. Community Needs Assessment Report (upload)
 - ✓ No revisions – ensure current copy is in the Organizational Standards Document Management System.
 - ✓ Recent revisions – Upload current report
8. Community Needs Assessment Summary Questions 1-5 (upload)
9. By-Laws (upload)
 - ✓ No Revisions – ensure current copy is in the Organizational Standards Document Management System.
 - ✓ Recent revisions – Upload current By-Laws.
10. Explanation of low-income Board participation; petition for adequate representation. (upload)
11. Board Training Plan (upload – see template)
12. Board Membership Roster (attachment for upload)
13. Agency Organization Chart (upload)
14. Compliance with the Pro-Childrens Act of 1994 Certification (attachment for upload)
15. Confax Certification (attachment for upload)
16. Annual CONFAX (Organizational Standards system upload)
17. Primary Contact Information (upload)

The omission of any of the above information could delay contract processing.

Attachments

1. Board Training Template (Required)
2. Board Membership Roster
3. Confax Certification
4. Compliance with the Pro-Childrens Act of 1994 Certification