The Annie E. Casey Foundation

CLASP
policy solutions that work for low-income people

Federal Funding for Integrated Service Delivery: A Toolkit

Due to low wages, lack of benefits, and inconsistent employment, many workers are unable to meet their own and their families' basic needs through employment alone. The Annie E. Casey Foundation developed the Center for Working Families® (CWF) concept as a response to the challenges facing such low-income working adults and their families. Built on years of experience in the field, the CWF approach acknowledges the problems faced by low-income families who must navigate a fragmented system to obtain critically needed work-supporting services and benefits. CWF offers a framework for delivering key services and financial supports to low-income workers using an integrated approach designed to foster new economic opportunities.

The CWF approach revolves around offering clients a set of focused bundled services in three overlapping areas:

- **Employment and career advancement** - including assistance with job readiness, job placement, occupational skills training, education and career advancement.
- **Income enhancements and work supports** - helping clients gain access to public benefits, tax credits, financial aid and other benefits to improve their financial security.
- **Financial and asset building services** - workshops, classes, one-on-one counseling and access to well-priced financial products and services to help clients improve their household finances and build assets.

A key aspect of the CWF model is that programs bundle and sequence services rather than offering just one component, or offering multiple components but leaving it up to participants to discover and seek out additional services. The hope is that the services will have a more-than-additive effect in promoting economic security, enabling clients to resolve immediate crises, acquire skills and credentials, get better jobs, and build the savings needed to prevent the next crisis and build for the future. Early evidence indicates that clients who receive bundled services are three to four times more likely to achieve a major economic outcome (such as staying employed, earning a vocational certification or associate's degree or buying a car) than clients receiving only one type of service.

Delivering integrated services requires well-planned program design, the hiring and training of staff with strong skills and backgrounds, and the thoughtful use of technology and data collection. In 2010, the Annie E. Casey Foundation asked CLASP to conduct a scan of federal programs that could potentially be used to support integrated service delivery in these three areas, recognizing the need to access public funds in order to bring this approach to scale.

The following briefs describe the federal funding programs we identified, with a focus on the components of the integrated strategy that might be publicly supported, the eligible populations and use of funds, and possible issues that might arise. Not every funding stream will be appropriate for every CWF-type program, but we hope that this will be a valuable resource to program seeking to leverage public funding in support of integrated service delivery.

For more information, contact Abigail Newcomer at anewcomer@clasp.org

Overview Materials

Program Summaries

Cross-Cutting Programs:

Education and Training Focused Programs:

College Access and Success Including Financial Aid:

Benefits Access:

Financial Services:

Special Populations:

Federal Funding Streams At-A-Glance

Federal Programs	Infrastructure			Core 1: Employment and Career Advancement			Core 2: Income Enhancements and Work Supports				Core 3: Financial and Asset Building	
	Case Management	Research & Evaluation	Technology	Job Training	Case Management (for employment)	Job Retention Support	Tax Preparation	Income Supports	Supportive Services/ Human Services Referrals	Financial Aid	Financial Coaching	Savings and Asset Building Programs
Temporary Assistance for Needy Families (TANF) Block Grant	●	●	●	●	●	●	●	●	●	●	●	●
Community Services Block Grant (CSBG)	●	●	●	●	●	●	●	●	●	●	●	●
Social Services Block Grant (SSBG)	●	●	●	●	●	●	●	●	●	●	●	●
Community Development Block Grant (CDBG)	●		●	●	●	●	●		●		●	●
Workforce Investment Act (WIA) -- Title I, Adults and Dislocated Workers	●			●	●	●		●	●	●		
Workforce Investment Act (WIA) -- Title I, Youth	●	●		●	●	●		●	●	●	●	
Supplemental Nutrition Assistance Program (SNAP) Employment and Training	●	●	●	●	●	●		●	●	●	●	
TRIO Student Support Services (SSS)					●				●	●	●	
TRIO Educational Opportunity Centers (EOC)										●	●	
College Access Challenge Grant (CACG)					●					●	●	
Supplemental Nutrition Assistance Program (SNAP) Outreach Funding			●					●				
Supplemental Nutrition Assistance Program (SNAP) Participation Grants			●					●				
Medicaid and CHIP Outreach Funding			●					●				
Volunteer Income Tax Assistance (VITA) Grants			●				●					
Assets for Independence (AFI) Demonstration Project	●	●						●	●	●	●	●
Resident Opportunity and Self-Sufficiency (ROSS) Case Management for Public Housing Residents	●				●			●				

Integrated Service Delivery Component Definitions

Component of Integrated Service Delivery	Definition
Infrastructure	**Case management or coaching that looks at participants' needs and goals across the three core areas is central to integrated service delivery. Staff that delivery individual services may need to be cross-trained in the other core areas. Infrastructure also covers needs assessments, facilities, information technology, and research and evaluation.**
Case Management	Case managers or coaches identify the immediate needs of customers, refer them to appropriate core services, and follow up to make services available later, as customers make progress in meeting their goals. Funding needs include salaries and staff training. Some integrated service providers call these positions "motivational coaches," emphasizing that they place responsibility for progress on the customer by facilitating action rather than telling the customer what to do.
Research & Evaluation	The approach is meant to be data driven and results-oriented. In order to demonstrate the added value of integrated service delivery it may be necessary to collect data in addition to what is necessary to meet the requirements of funding streams, and to monitor outcomes over longer periods of time.
Technology	Many providers of integrated services use technology solutions to screen for benefits, allow participants to develop and monitor their budgets, and track outcomes over time. Costs can include the purchase of computers, the licenses for software packages, and in some cases, development of customized solutions.
Core 1: Employment and Career Advancement	**Includes work-related education and training at all levels, job readiness, job search, placement and retention, and career advancement assistance.**
Job Training	In-house education and training or referrals to other providers of job training.
Case Management (for employment)	Individualized assessment and guidance in developing and carrying out career goals (skills assessment; job search and placement)
Job Retention Support	Assistance in overcoming obstacles (internal and external) to job retention, as well as career advancement guidance.

Core 2: Income Enhancements and Work Supports	Includes outreach, screening and application assistance and follow-up for a wide range of public benefits and services. It may include multi-benefit screening through a technological tool such as EarnBenefits or Benefit Bank.
Tax Preparation	Free tax preparation services are offered on site at many providers of integrated services and through referrals at others. This service expands access to the Earned Income Tax Credit and other credits, and reduces the fees customers pay to have their taxes prepared by commercial preparers. This is often a high-volume service that brings new customers to the service site.
Income Supports	Sites provide information about and eligibility screening for a range of benefits, such as food stamps, health insurance for children, and fuel assistance. This may include multi-benefit screening through a technological tool such as EarnBenefits or Benefit Bank. Staff may make referrals, assist customers with benefits applications, and follow-up on applications to identify and resolve problems that prevent enrollment.
Supportive Services/ Human Services Referrals	This may include referrals to substance abuse or mental health counseling and treatment, medical care, domestic violence services, or other needed resources.
Financial Aid	Customers receive, either directly or through referral, information about financial aid opportunities and assistance filling out applications for admission to postsecondary institutions. In most cases, integrated service providers do not provide grants or scholarships themselves, but connect customers to existing resources. This may be connected to tax preparation or multi-benefits screening.
Core 3: Financial and Asset Building	Includes opportunities for customers to improve their financial situation by increasing their level of financial education, helping them to save and build assets and reduce costs, particularly those associated with financial services with high interest rates and application or overdraft fees.
Financial Education and Coaching	Financial education may be provided in a classroom setting when appropriate, such as for teaching basic budgeting or introductory materials on credit and credit reports. Customers may also receive individualized financial coaching to help them establish budgets, set goals, and track progress over time.
Savings and Asset Building Programs	Integrated service providers often work with community partners to offer individual development accounts (IDAs) that promote savings by matching deposits made by participants. Every dollar a participant saves earns him or her an additional dollar. These accounts are typically dedicated to building a savings for a specific asset goal (a small business, a home or higher education). Providers may also assist participants in developing savings for car repairs, temporary cuts in hours or other emergency expenses.

Overview of Federal Funding Streams

Federal Programs	Funding Type			Grantees				Administering Agency
	Formula	Competitive	Matching	States	Communities*	Nonprofits	Colleges	
Temporary Assistance for Needy Families (TANF) Block Grant	●			●				HHS/ACF/OFA
Community Services Block Grant (CSBG)	●			●	●			HHS/ACF/OCS
Social Services Block Grant (SSBG)	●			●				HHS/ACF/OCS
Community Development Block Grant (CDBG)	●			●	●			HUD/CPD
Workforce Investment Act (WIA) -- Title I, Adults and Dislocated Workers	●			●	●			DOL/ETA
Workforce Investment Act (WIA) -- Title I, Youth	●			●	●			DOL/ETA
Supplemental Nutrition Assistance Program (SNAP) Employment and Training	●		●	●				USDA/FNS
TRIO Student Support Services (SSS)		●					●	ED/OPE/HEP
TRIO Educational Opportunity Centers (EOC)		●				●	●	ED/OPE/HEP
College Access Challenge Grant (CACG)	●			●				ED/OPE/TSDPS
Supplemental Nutrition Assistance Program (SNAP) Outreach Funding			●	●				USDA/FNS
Supplemental Nutrition Assistance Program (SNAP) Participation Grants		●		●		●		USDA/FNS
Medicaid and CHIP Outreach Funding		●	●	●		●		HHS/CMS
Volunteer Income Tax Assistance (VITA) Grants		●				●		IRS
Assets for Independence (AFI) Demonstration Project		●				●		HHS/ACF/OCS
Resident Opportunity and Self-Sufficiency (ROSS) Case Management for Public Housing Residents		●			●	●		HUD/PIH

DOL/ETA = U.S. Department of Labor, Employment and Training Administration
ED/OPE/HEP = U.S. Department of Education, Office of Postsecondary Education, Higher Education Programs
ED/OPE/TSDPS = U.S. Department of Education, Office of Postsecondary Education, Teacher and Student Development Program Services
HHS/ACF/OCS = U.S. Department of Health and Human Services, Administration for Children and Families, Office of Community Services
HHS/ACF/OFA = U.S. Department of Health and Human Services, Administration for Children and Families, Office of Family Assistance.
HHS/CMS = U.S. Department of Health and Human Services, Center for Medicare and Medicaid Services.
HUD/CPD = U.S. Department of Housing and Urban Development, Office of Community Development and Planning
HUD/PIH = U.S. Department of Housing and Urban Development, Office of Public and Indian Housing
USDA/FNS = U.S. Department of Agriculture, Food and Nutrition Service
* Communities includes programs with mandatory pass-through of funds.

Temporary Assistance for Needy Families (TANF) Block Grant

Temporary Assistance for Needy Families (TANF) is a fixed block grant providing flexible funding to states to support a wide range of activities for low-income families with children. With few restrictions, TANF funds can be used for any activity reasonably aimed at one of the four statutory purposes. Almost all components of integrated service delivery when provided to members of low-income families with children (including non-custodial parents), can be reasonably justified as promoting the second statutory purpose of TANF to "end the dependence of needy parents on government benefits by promoting job preparation, work, and marriage."

Elements of Integrated Service Delivery

Infrastructure		Core 1: Employment and Career Advancement		Core 2: Income Enhancements and Work Supports		Core 3: Financial and Asset Building	
Case Management	●	Job Training	●	Tax Preparation	●	Financial Coaching	●
Research & Evaluation	●	Case Management (for employment)	●	Income Supports	●	Savings and Asset Building Programs	●
Technology	●	Job Retention Support	●	Supportive Services/ Human Services Referrals	●		
				Financial Aid	●		

State and Nonprofit Examples

Kentucky Ready-to-Work Program: Kentucky uses federal TANF funds to support a program called Ready-to-Work, which helps TANF recipients pursue postsecondary credentials and degrees, education leading to a GED, and/or remedial education at community and technical colleges. Each community/technical college uses TANF funds to hire a Ready-to-Work coordinator who serves as an on-campus case manager, ensuring that students receive supportive services such as transportation and child care, and the counseling and academic assistance they need to complete their programs. Students also have opportunities to participate in TANF-funded work-study, which provides them income not counted toward TANF eligibility and helps them fulfill their federal TANF work participation requirements.[1]

Arkansas Career Pathways Initiative (CPI): CPI serves students at Arkansas' 22 two-year colleges and three technical centers. It offers a comprehensive set of academic and support services designed to enable low-income, low-skill participants to obtain the degrees and/or credentials required to get and keep jobs in selected high-demand, high-wage industries. CPI is funded with federal TANF dollars, but is not limited to recipients of TANF cash assistance. Students are eligible if they are adult caretakers of children under 21 and have incomes below 250 percent of the federal poverty line. Parents who participate (or whose children participate) in certain other means-tested programs are automatically eligible. CPI uses TANF funds to provide up to $1,500 a year per participant for tuition and support services, including child care and transportation assistance.[2]

Eligibility and Targeting

TANF funds are awarded to states, territories and Indian tribes. Grantees may use TANF funds to sub-grant or contract with other state or local agencies, or with private entities.

Most TANF funded benefits and services are limited to members of "needy families." To be eligible for cash assistance, a needy family must include a minor child. However, for purposes of providing services that do not count as "assistance" -- including the core elements of integrated service delivery -- a state may include families with older youth up to age 24. Non-custodial parents may be served either as members of needy families, or as part of projects designed to promote marriage or reduce out of wedlock pregnancies.

States set their own income definitions and limits for "needy" and can use different income limits for different services. Many states have established much higher limits for some services, such as 200 percent of the Federal Poverty Level.

Federal Funding: $16.5 billion in annual block grant funding. The Recovery Act provided an additional $5 billion available during FYs 2009 and 2010.

Type of Program: Formula grant to states.

Agency with Jurisdiction: U.S. Department of Health and Human Services (HHS), Administration for Children and Families (ACF).

Match Required: No match is required, but states must meet a maintenance of effort (MOE) requirement.

Services/Program Support

Unless otherwise prohibited, TANF funds can be used in any way that is reasonably aimed at meeting one of the four purposes of TANF:

1. Provide assistance to needy families so that children may be cared for in their own homes or in the homes of relatives;
2. End the dependence of needy parents on government benefits by promoting job preparation, work and marriage;
3. Prevent and reduce the incidence of out-of-wedlock pregnancies and establish annual numerical goals for preventing and reducing the incidence of these pregnancies; and
4. Encourage the formation and maintenance of two-parent families.

All components of the CWF model can be justified under purpose #2, to the extent that they benefit members of needy families (including non-custodial parents). When TANF funds are blended with other funding streams supporting programs that serve mixed populations, TANF cannot be charged a share of the total costs out of proportion to services received by TANF recipients and/or other needy families with children. TANF funds can only be used to serve childless adults, or to support non-means tested services, if the state makes a case that these services promote purposes #3 or #4.

Support for individual development accounts (IDAs) is mentioned in the TANF statute as a possible use of funds. In FY 2009, states reported using only $2.4 million of TANF and state maintenance of effort (MOE) funds for IDAs.

In order for the state to use TANF funds to support integrated service delivery, the activities should be included in the TANF state plan. U.S. Department of Health and Human Service (HHS) approval is not needed.

Non-Federal Funds

States are required to meet MOE requirement for spending on services or benefits for low-income families equal to 75 percent of state spending on predecessor programs[3] prior to the creation of TANF. This MOE requirement increases to 80 percent when states fail to meet the work participation rate requirement for families receiving assistance.

Spending that can be claimed toward the maintenance of effort requirement is referred to in the statute as "qualified state expenditures" but is more often described as "state MOE funds." A set of rules in the TANF

law define which funds states can use as MOE funds. For example, funds must be direct expenditures, from state general revenue or in-kind donations by third-party entities, and not originate or be used as a match or MOE requirement for another federal program. They must be used for benefits or services provided on behalf of members of eligible families.

Program Limitations

TANF and MOE funds may be used for outreach and informational activities aimed at helping members of low-income families access income and work supports other than TANF, such as children's health insurance, the Supplemental Nutrition Assistance Program (SNAP or Food Stamps), the Earned Income Tax Credit, and Supplemental Security Income. However, the same costs may not be charged against both TANF or MOE and another program. Costs associated with individual eligibility determination for other programs are considered administrative costs of those programs and cannot be charged against TANF.

Unless specifically allowed, TANF funds may not be used to satisfy the cost-sharing or matching requirements of another federal program.

TANF funded benefits or services may not be provided to most immigrants for five years after their arrival. This ban does not apply to funds claimed as MOE. TANF funds may not be used for construction, rehabilitation, the purchase of buildings, or medical expenses, including the purchase of health insurance. This prohibition applies to grantees and sub-recipients, including county sub-grantees, nonprofit agencies and contractors.

State Allocations and Contacts

State TANF allocations are available from Table B in: http://www.acf.hhs.gov/programs/ofa/data-reports/annualreport8/chapter02/chap02.htm

TANF is typically operated by state human services or workforce agencies. State TANF directors are listed at: http://www.acf.hhs.gov/programs/ofa/states/tanf_dir.html and websites are listed at: http://www.clasp.org/issues/pages?type=temporary_assistance&id=0010

Community Services Block Grant (CSBG)

The Community Services Block Grant (CSBG), administered by states, provides core funding to local agencies to reduce poverty, revitalize low-income communities and empower low-income families to become self-sufficient. CSBG is a block grant which funds the operations of a state-administered network of local agencies, primarily Community Action Agencies (CAAs), charged with changing conditions that perpetuate poverty in their communities. Their services include, "employment, education, income management, housing, nutrition, emergency services and health"[4] programs and activities. CSBG's flexibility and focus on meeting needs of individuals and families living in poverty and assisting them to achieve self-sufficiency makes it a natural fit for integrated service delivery. Although this funding source is non-competitive, other community-based agencies may partner with CAAs to promote a focus on long-term economic self-sufficiency and integrated models of service delivery.

Elements of Integrated Service Delivery							
Infrastructure		**Core 1: Employment and Career Advancement**		**Core 2: Income Enhancements and Work Supports**		**Core 3: Financial and Asset Building**	
Case Management	●	Job Training	●	Tax Preparation	●	Financial Coaching	●
Research & Evaluation	●	Case Management (for employment)	●	Income Supports	●	Savings and Asset Building Programs	●
Technology	●	Job Retention Support	●	Supportive Services/ Human Services Referrals	●		
				Financial Aid			

State and Nonprofit Examples

Community Action Agency of New Haven: The Community Action Agency of New Haven, Connecticut devoted 1/3 of its approximately $1.5 million of CSBG funds from the Recovery Act to expand "Manage your Future," an IDA program for youth, aged 14 to 21, undergoing training. The program provides youth with the skills they need to become self-sufficient. "Manage your Future" also provides supportive services, including adult mentoring, extensive case management and cultural enrichment experiences; and focuses on developing money management skills and providing internship opportunities. Recovery Act funds were used to expand the number of participants and to engage them in a new academic, education-to-work component. Once these funds run out, the CAANH will continue the program using CSBG and private funding.[5]

Central Vermont Community Action Council, Barre, Vermont: Central Vermont Community Action Council serves 11,000 individuals in 56 towns throughout north central Vermont. Through the "Micro Business Development Program," which has existed for over twenty years, the organization offers business development assistance to low-income Vermonters. The program, which also trains rural business owners to prepare their own taxes, received recognition from the U.S. Internal Revenue Service Rural Strategy Team. An advisory group of microenterprise practitioners, and professional and volunteer tax preparers developed the program and evaluate its results.[6]

Eligibility and Targeting

States, territories, and tribal organizations receive grants based on the percentage of individuals living in poverty. In turn, jurisdictions and eligible community agencies provide services to individuals and families in poverty. States can revise the income limit to serve individuals and families who earn up to 125 percent of the official federal poverty line.[7]

States allocate by formula ninety percent of CSBG funding to eligible entities, primarily CAAs, which are community-based organizations. Eligible entities may be nonprofit, private and public organizations that focus on helping low-income people reach self-sufficiency. CAAs were established under the Economic Opportunity Act of 1964 as part of the war on poverty. CAAs are required to maintain specific structures, including "tripartite boards" with 1/3 low-income community members, 1/3 public officials, and 1/3 private sector representatives.[8] Some states fund local entities that are jointly local governments and CAAs. For example, Chicago city government is the CSBG agency. With few exceptions, the same entities are funded each year.[9]
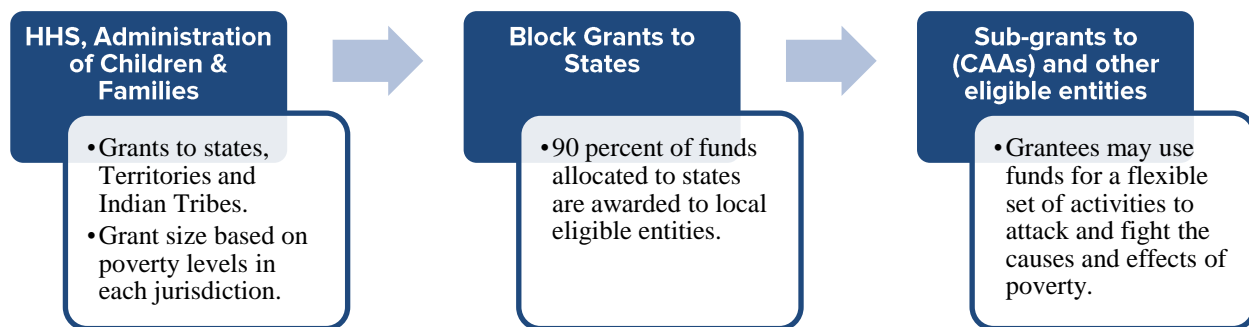
Up to five percent of CSBG funds can be used by states to administer the program. States can utilize the remainder of CSBG funds for activities consistent with the overall CSBG purposes, such as coordinating state or local programs and services with other services provided by eligible entities, supporting asset-building programs for low-income individuals, supporting state charity tax credits, and other innovative community-based projects.

> **Federal Funding:** $654 million in FY08; $700 million in FY09 plus one-time $1 billion from the American Recovery and Reinvestment Act (ARRA).
>
> **Type of Program:** Formula Grants to states to award at least 90% to local eligible entities.
>
> **Agency with Jurisdiction:** U.S. Department of Health and Human Services, Administration for Children and Families.
>
> **Match Required:** No match or maintenance of effort funds are required.

HHS, Administration of Children & Families
- Grants to states, Territories and Indian Tribes.
- Grant size based on poverty levels in each jurisdiction.

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Block Grants to States
- 90 percent of funds allocated to states are awarded to local eligible entities.

→

Sub-grants to (CAAs) and other eligible entities
- Grantees may use funds for a flexible set of activities to attack and fight the causes and effects of poverty.

Under the Recovery Act, states received no administrative funding, but were required to reserve one percent of the funds for "benefits enrollment coordination activities relating to the identification and enrollment of eligible individuals and families in Federal, State, and local benefit programs." Though it is not a recurring funding source, the focus on benefits enrollment is notable and may indicate potential for collaboration.

Services/Program Support

The CSBG authorizing legislation lists five goals:

1. To strengthen community capabilities for providing a range of assistance to eliminate poverty to meet local needs and conditions.

2. To organize a range of services to meet the needs of low-income families and individuals that help alleviate the causes of poverty and promote self-sufficiency.

3. To use innovative and effective community-based approaches to attacking the causes and effects of poverty and community breakdown.

4. To maximize the participation of residents of low-income communities and members of the groups served by CSBG programs in their communities, and empower them to respond to the problems and needs in their communities.

5. To broaden resources aimed at eliminating poverty by engaging outside organizations in the effective delivery of services. This includes pursuing a more active role for private, religious, charitable, and neighborhood-based organizations and individual citizens and business, labor and professional groups, who are able to improve opportunities and services for the poor.[10]

Because of the extremely flexible nature of CSBG funds, they are often used to fill gaps in funding created by restrictive programs. Eligible entities use funds for an array of purposes meant to reduce poverty and increase self-sufficiency. In 2008, for example, CAAs reported using 14 percent of their funding for "linkages," meaning they mobilized and coordinated community members or groups that serve in communities to combat community-wide causes and conditions of poverty. They reported using an additional 16 percent for "self-sufficiency initiatives," which have the same goals as integrated service delivery providers – to increase economic security for low-wage workers, retirees and families. These programs have an extended period of engagement and provide a more comprehensive and coordinated set of support services to clients.[11]

Program Limitations

Organizations that administer integrated services, if not a current CSBG grantee, will need to create a partnership with one to access this funding stream.

While promoting the long-term economic stability of individuals and communities is central to the CSBG mission, grantees must design their services around community needs. As a result, in practice, some devote most of their funds to addressing the immediate needs of individuals in emergency situations. Particularly when so many people are suffering from the effects of the recession, it may be difficult to draw funds away from these activities to devote them to the integrated service delivery approach.

Grantees and Application Process

For a list of grant amounts by state, see:
http://www.acf.hhs.gov/programs/ocs/csbg/allocations/2009allocations.htm.

For a list of service providers by state, see: http://www.acf.hhs.gov/programs/ocs/csbg/documents/caa/8c.html.

Social Services Block Grant (SSBG, also known as Title XX)

The Social Services Block Grant (SSBG), sometimes referred to as "Title XX" (of the Social Security Act), is a block grant providing flexible funding to states to support a wide range of activities.. Almost all components of integrated service delivery can be reasonably justified as promoting self-sufficiency or reducing dependency, two of the main goals of SSBG grants. States may provide services directly or contract with qualified organizations, including community-based organizations, to provide them. The primary barrier to accessing SSBG funds to support integrated service is that states have already committed their block grants to other activities. SSBG funding has declined over time and there are many competing uses of these funds.

Elements of Integrated Service Delivery

Infrastructure		Core 1: Employment and Career Advancement		Core 2: Income Enhancements and Work Supports		Core 3: Financial and Asset Building	
Case Management	●	Job Training	●	Tax Preparation	●	Financial Coaching	●
Research & Evaluation	●	Case Management (for employment)	●	Income Supports	●	Savings and Asset Building Programs	●
Technology	●	Job Retention Support	●	Supportive Services/ Human Services Referrals	●		
				Financial Aid	●		

State and Nonprofit Examples

Instituto Del Progreso Latino, Mujer Avanzando (Pathways to Independence), Chicago, Illinois: The state of Illinois uses its SSBG funds to contract with over 150 institutions to provide services in nine different program areas, including promote economic self-support, self-sufficiency, preventing neglect and abuse of children and adults, and preventing or reducing institutional care.[12] The Mujer Avanzando program at Instituto falls under the category of employment programs for cash assistance recipients and other and low-income families. Mujer Avanzando responds to the needs of Latina single mothers in Chicago by providing comprehensive services, career pathways, wealth creation, leadership development and childcare services. Instituto partners with two other organizations, the Resurrection Project and Mujeres Latinas en Acción, to administer the program, which provides a bundled set of services for low-income Latina heads of households.[13]

Eligibility and Targeting

States have a great deal of discretion regarding what services will be provided, who is eligible to receive them, and how funds are used. There is no sub-state allocation requirement.

In addition to the directly appropriated funds, states may transfer up to 10 percent of their Temporary Assistance for Needy Families (TANF) block grant into SSBG. These funds may only be used to provide services for children and families whose income is less than 200 percent of the federal poverty level. Such transfers have increased the funds available to states under SSBG by around 65 percent (over $1 million) in recent years.[14]

Federal Funding: $1.7 billion in FY 2010 plus additional funds from state TANF transfers.

Type of Program: Formula Grants to states.

Agency with Jurisdiction: U.S Department of Health and Human Services (HHS), Administration for Children and Families (ACF), Office of Community Services (OCS).

Non-Federal Funds: No matching or maintenance of effort funds are required.

Services/Program Support

Virtually all CWF activities can be supported under the first two purposes of SSBG:

- Achieving or maintaining economic self-support to prevent, reduce or eliminate dependency; and
- Achieving or maintaining self-sufficiency, including reduction or prevention of dependency.

Before a state receives a SSBG allotment, it must submit a report that describes how the state plans to administer its SSBG funds for the coming year. This report must describe the intended use of SSBG funds, including the types of activities or services to be supported, and the categories and characteristics of individuals to be served (such as children, adults 59 and younger, adults 60 and older, and individuals with disabilities).

There are 28 specified categories of services that may be supported under SSBG, plus the opportunity to report spending as "other." The service categories most likely to be used to support the CWF model include case management, education and training, employment services, information and referral, legal services, and transportation.

There is no typical set of programs or resources supported by SSBG, precisely because the grant program is so flexible. In 2008, the service categories receiving the highest proportion of SSBG funds were child foster care services, special services for individuals with disabilities, and child protective services, each of which accounted for about 13 percent of expenditures. However, the services that each state used the grant for varied widely. Connecticut, for example, spent 35 percent of its allocation on child care, 12 percent on independent/transitional living, and 9 percent on home-based services. Arkansas spent 21 percent on residential treatment programs and 17 percent on special services for the disabled. [15]

States may provide services directly or purchase them from qualified agencies or organizations. Some services, such as child and adult protective services, are most often operated directly by public agencies, while others, such as services for at-risk youth, are more often contracted. States often use a combination of public and private entities to deliver services. States also may use SSBG funds to support staff training, planning and evaluation, and other administrative functions.

Program Limitations

SSBG funds cannot be used for capital purchases or improvements, job subsidies, medical care, social services for residents of institutions, or public education. In general, funds cannot be used for cash payments to individuals, but may be used for vouchers for families that have reached the welfare time limits or for children who are denied cash assistance because of "family cap" policies.

SSBG funding is significantly lower than it used to be, reducing the odds that states will be able to fund new activities from this source. From 1980 to 1997, SSBG funding ranged from $2.5 billion to $3 billion. The 1998 transportation act phased SSBG funding down to $1.7 billion starting in 2001, where it has remained ever since. The only exception to this pattern of flat funding is that, in FY 2006 and again in FY 2009, Congress provided targeted supplemental funding for SSBG aimed at providing relief for needs caused by hurricanes, floods and other natural disasters.

State Allocations and Contacts

State SSBG allocations are available at: http://www.acf.hhs.gov/programs/ocs/ssbg/docs/esalloc10.html
SSBG is typically operated by state human services or children and families agencies. Contacts are listed at:
http://www.acf.hhs.gov/programs/ocs/ssbg/grantees/Contact_08.html

Community Development Block Grant (CDBG)

The Community Development Block Grant (CDBG) is a flexible funding stream aimed at urban communities. Funds are predominantly used for the development of affordable and suitable housing for low- and moderate-income individuals and families in cities, and economic development activities that improve community facilities and services. Another goal of the program is to expand economic opportunities for low- and moderate-income communities. The range of permissible services is broad and overlaps with components of the integrated service delivery approach. Funds are allocated both to large cities and metropolitan areas, called "entitlement communities," and to states, which are responsible for allocating funds to less populous areas.[16]

Elements of Integrated Service Delivery							
Infrastructure		Core 1: Employment and Career Advancement		Core 2: Income Enhancements and Work Supports		Core 3: Financial and Asset Building	
Case Management	●	Job Training	●	Tax Preparation	●	Financial Coaching	●
Research & Evaluation		Case Management (for employment)	●	Income Supports		Savings and Asset Building Programs	●
Technology	●	Job Retention Support	●	Supportive Services/ Human Services Referrals	●		
				Financial Aid			

State and Nonprofit Examples

Hawthorne Center for Working Families, Indianapolis, Indiana: The Hawthorne Center for Working Families (CWF) administered by the Local Initiatives Support Corporation (LISC) in Indianapolis successfully leverages the Community Development Block Grant to fund general operating expenses. It is one of 16 sub-grantee organizations, named in the 2010 CDBG action plan, that contribute to the city's workforce development and support of low-income populations.[17] For 2011, the local workforce investment board (WIB) will oversee a portion of CDBG funds set aside for workforce development. The WIB will allocate grants to local nonprofits for workforce development capacity building and other activities that build connections between neighborhoods and the one-stop system. The Hawthorne CWF is also part of a large collaborative strategy called the "Great Indy Neighborhoods Initiative" supported by LISC, the Indianapolis Neighborhood Resource Center, the city of Indianapolis and a steering committee that promotes comprehensive and neighborhood-based approaches to community development and engagement.[18] The ongoing relationship between LISC, a large intermediary, and the city of Indianapolis opens doors for the CWF to gain public funding.

Portland Economic Opportunity Initiative: The consolidated plan for the city of Portland, Oregon, lays out both an anti-poverty plan and an economic opportunity strategy. Each contains funding and partnership opportunities for community based organizations to carry out a set of services in an integrated manner, with the purpose of increasing the income and assets of low-income individuals and families. The language of the plan emphasizes the need for creative ideas that will further economic opportunities for this group of residents. Portland's Bureau of Housing and Community Development (BHCD) and the Northwest Area Foundation collaborated to create the economic opportunity strategy in 2004. Today, it makes grants available for microenterprise and job creation, asset building and work supports programs.[19] In 2010, the Portland Economic Development Commission funded seven microenterprise projects, twelve adult workforce development projects and twelve youth workforce development projects as part of the strategy.[20]

North Carolina Division of Community Assistance: The North Carolina Division of Community Assistance (DCA) has set aside CDBG funding for community based partnerships with organizations administering individual development account (IDA) programs in non-entitlement communities. The state funds programs at a maximum of $1,000 per individual, but the CDBG funds may be used as the match for federal Assets for Independence demonstration project grants. Programs must match participant savings at a level of at least 2:1, and must have at least 20 IDA program participants.[21]

Eligibility and Targeting

CDBG is targeted at low- and moderate-income populations. At least 70 percent of block grant funds must be used to improve conditions for low- and moderate-income individuals and families. Funding is allocated among states and communities based on a calculation that considers population, poverty level and level of housing overcrowding in the city and metropolitan areas, as well as a ratio of growth lag, poverty level, and age of housing in cities and metropolitan areas.[22] However, nearly every large city or metropolitan area receives some funding under the program.

The program annually appropriates grants by formula to:

- **Entitlement Communities**: Cities whose "metropolitan statistical area" is at least 50,000 people and large suburban counties with populations of 200,000 or more, excluding the population of the city they surround.

- **Non-Entitlement Communities**: Smaller, less populous areas. States are tasked with distributing CDBG funds to communities that do not qualify as entitlement communities. States receive 30 percent of the total CDBG allocation for this purpose. CDBG grants cover a small portion of state administrative costs, and states must provide the rest. States are also permitted to use one percent of the grant for technical assistance to local communities and nonprofit organizations.
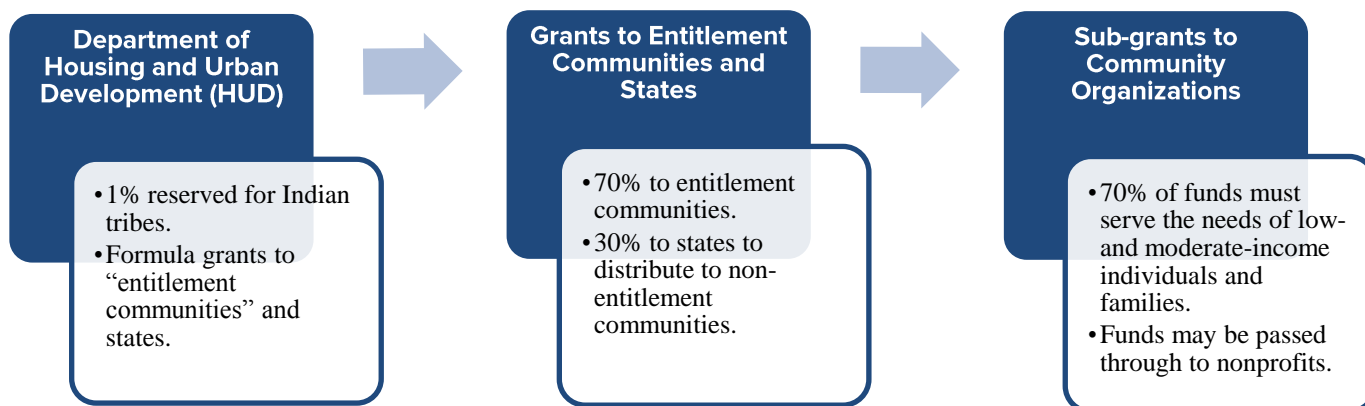
> **Federal Funding:** For FY10, an estimated $4.4 billion, with $2.8 billion allocated to entitlement communities, $1.2 billion to non-entitlement communities via states. The remaining portion was used for CDBG set asides.
>
> **Type of Program:** Formula grants to cities and suburban areas, as well as to states, which pass through funding to less populous cities and towns.
>
> **Agency with Jurisdiction:** U.S. Department of Housing and Urban Development (HUD), Office of Community Planning & Development.
>
> **Match Required:** No match or maintenance of effort requirement. Moreover, in many cases, CDBG funds may be used as the "non-federal match" for other federal funding streams.

Though Community Development Block Grants are allocated by formula, grantees are required to submit a consolidated plan every five years that describes their housing programs and plans to achieve community planning and development goals. Plans must also include a description of how the community will be engaged in the process. Communities receiving grants may sub-contract with nonprofit, community organizations or for-profit enterprises to carry out economic development activities.[23] This feature, along with the program's general flexibility, makes CDBG a potential funding source for integrated service delivery. Organizations interested in receiving funding should actively engage in the consolidated planning process.

Department of Housing and Urban Development (HUD)		Grants to Entitlement Communities and States		Sub-grants to Community Organizations
• 1% reserved for Indian tribes. • Formula grants to "entitlement communities" and states.	→	• 70% to entitlement communities. • 30% to states to distribute to non-entitlement communities.	→	• 70% of funds must serve the needs of low- and moderate-income individuals and families. • Funds may be passed through to nonprofits.

Services/Program Support

CDBG activities must meet one of three program objectives. They must:

- Benefit low- and moderate-income persons;
- Prevent or eliminate slums or blight; or
- Address community development needs having a particular urgency because conditions pose a serious and immediate threat to community health or welfare.

The majority of CDBG funding is devoted to the development of housing and community infrastructure, such as roads and bridges. Significant amounts are also used for economic development activities. These can include job creation and retention activities aimed at employment of low- and moderate-income individuals. These activities are frequently aimed at recruiting and retaining businesses, rather than funding community-based organizations. However, such projects can also include "screening, referral, and placement of applicants for employment opportunities generated by CDBG-eligible economic development activities, including the costs of providing necessary training for persons filling those positions."[24] This could present an opportunity for funding the workforce components of integrated service delivery.

By statute, CDBG funds may be used for a long list of eligible activities, including "public services" addressing employment, child care, health, drug abuse, education, and welfare needs. Most components of integrated service delivery could be supported in this list of activities. However, in most cases, communities may spend no more than 15 percent of the grant on public services.[25] CDBG funds may not supplant other public service spending. To justify increases in public service spending, the community must demonstrate in its five year plan that the service it plans to fund will either be new or constitute a substantive increase in the amount or quality of service.[26] The extent to which grantees choose to use CDBG for public services varies greatly.

Communities often sub-grant a portion of CDBG funds to community based development organizations (CBDOs).[27] These nonprofit organizations were created to construct housing, but also carry out public services related to neighborhood revitalization, community economic development and energy conservation. Funds these organizations receive are not subject to the limitations on public services described above.[28] Entitlement communities also have the option of sub-granting to non-CBDO nonprofit organizations.

CDBG is unusual in that it can be used as match funding for some other federal programs. (Typically, federal funds cannot be used to match other federal funds.) Several states use CDBG funds as the match for IDAs funded through the Assets for Independence demonstration project.[29]

In short, the Community Development Block Grant is a flexible funding source, with only limited reporting and administrative requirements as compared to other federal grants. However, uses of funds vary greatly based on

the priorities of particular entitlement communities, and the ways those priorities are expressed in CDBG consolidated plans. Entities seeking funding should submit public comment as consolidated plans are developed and connect to those developing them in other ways. Partnering with an existing CDBO or other sub-grantee is the most likely way to access CDBG funds between consolidated plan cycles.

Program Limitations

Activities that are overtly political and those that allocate direct payments, such as cash assistance, are expressly prohibited. Up to 15 percent of funds may be used on public services; however, in places where funds have not previously been used for this purpose, there may be resistance to using the CDBG for activities other than housing revitalization, physical infrastructure, and business-focused economic development. There is a 20 percent cap on planning and administrative costs.[30]

State Allocations and Contacts

State CDBG allocations by state are listed at: http://www.hud.gov/offices/cpd/communitydevelopment/budget/.

The best contact people are the HUD Field Office Directors, whose contact information can be found at: http://www.hud.gov/offices/cpd/about/staff/fodirectors/.

Workforce Investment Act -- Title I, Adults & Dislocated Workers

The Workforce Investment Act (WIA) constitutes the largest federal funding source for workforce development activities. Its goal is to streamline and coordinate service delivery of multiple employment, education and training programs.[31] Title I funding for adults and dislocated workers provides funding for "one-stop" career centers where employers and job seekers can access job preparation and job search activities, and a more limited number of job training opportunities. These funds are allocated through formula grants to states, with a mandatory pass-through to local areas. Nonprofit organizations can access funds by entering into agreements with local Workforce Investment Boards (WIBs) to provide core or intensive workforce services, either as "satellite one-stops," or as part of a consortium of providers. Nonprofits may also become eligible training providers that participants can access through "individual training accounts" (ITAs).

Elements of Integrated Service Delivery

Infrastructure		Core 1: Employment and Career Advancement		Core 2: Income Enhancements and Work Supports		Core 3: Financial and Asset Building	
Case Management	●	Job Training	●	Tax Preparation		Financial Coaching	
Research & Evaluation		Case Management (for employment)	●	Income Supports	●	Savings and Asset Building Programs	
Technology		Job Retention Support	●	Supportive Services/ Human Services Referrals	●		
				Financial Aid	●		

State and Nonprofit Examples

The Job Center, Dayton, Ohio: The WIA one-stop in Dayton, Ohio is the largest one-stop in the country. It was created with a "no wrong door" concept, meaning that clients have access to an array of services regardless of which service they seek out first. The Job Center integrates social services and workforce functions by providing core and intensive WIA services, access to case workers who can determine eligibility for cash assistance and means tested work supports, and links to medical and financial services.[32] The Center is a public/private partnership and, after more than ten years, contains 47 organizations as well as the government-run WIA one-stop. The Job Center has been the subject of a number of research projects, including MDRC's Work Advancement and Support Center demonstration project, whose purpose was to test whether combining job retention and advancement services with simplified access to financial supports would improve outcomes for low-income job seekers.[33]

Instituto Del Progreso Latino, Chicago, Illinois: Instituto runs a Center for Working Families (CWF) that provides individualized case management, financial literacy and one-on-one financial coaching, tax preparation, income and work supports, and workforce training. Instituto is well-known in the community as a provider of citizenship, adult education and bridge training programs. Participants in each program are referred to others at the organization when appropriate. Instituto partners with organizations that provide financial literacy workshops, one-on-one financial coaching and free tax preparation. The CWF is funded through Chicago's WIA Title I grant, which funds all aspects of the program, including individualized coaching and integrated services delivery. Supplemental funds come from Chicago's Community Services and Community Development Block Grants, the Illinois Social Services Block Grant and private foundations. Instituto blends

these funding streams and allocates them to different pieces of the CWF to ensure it meets the requirements of each federal program and targets the populations set forth in private grants. [34]

Eligibility and Targeting

These programs are targeted towards:

- **Adults:** Individuals aged 18 and older. When funds are limited, adult programs must give priority to public assistance recipients and other low-income individuals.
- **Dislocated workers:** Individuals, who have lost their jobs, are dislocated as a result of plant closings or mass layoffs in industries that are unlikely to return, formerly self-employed individuals, and displaced homemakers who have been dependent on income of another family member.

WIA Title I funds are allocated to states and outlying areas through formula grants.[35] The largest difference between the formulas for the adult program and the dislocated worker program is that 20 percent of the dislocated worker program appropriation is reserved for the federally administered National Emergency Grant (NEG) program, dislocated worker demonstration projects and technical assistance (TA). NEG grants are competitive grants for states and outlying areas experiencing major economic dislocations which can be used for the same purposes as other dislocated worker funds, such as for the retraining or reemployment of dislocated workers affected by significant layoffs, adverse economic events or major disasters. Other differences between adult and dislocated work programs are outlined in the charts below.

Federal Funding: In Fiscal Year (FY) 2010, the adult program received $861.5 million. The dislocated worker program received $1.4 billion, of which $229 million was reserved for National Emergency Grants.

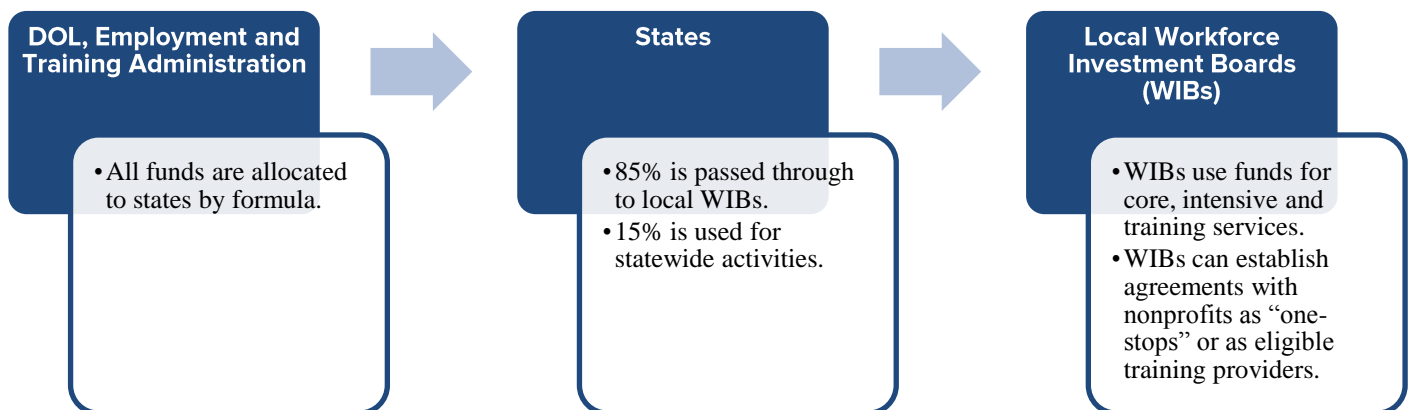These programs also received funds through the Recovery Act enacted in 2009. $500 million was allocated to the adult program and $1.45 billion to the dislocated worker program.

Type of Program: Formula grants to states with a mandatory pass-through to local workforce investment areas.
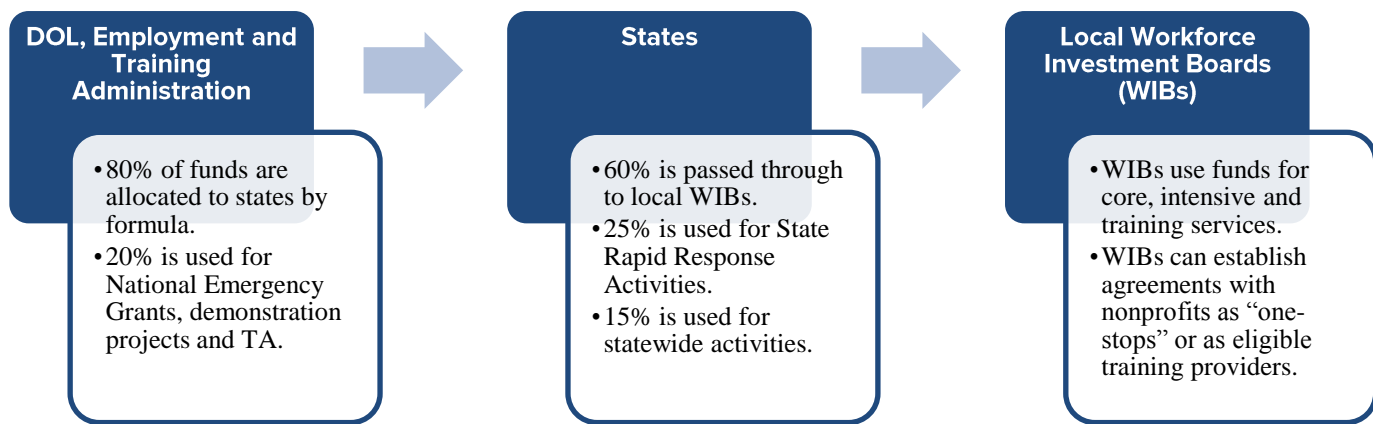
Agency with Jurisdiction: U.S. Department of Labor (DOL), Employment and Training Administration.

Non-Federal Funds: No matching requirement or maintenance of effort funds required.

Adult Formula Grants:

DOL, Employment and Training Administration	States	Local Workforce Investment Boards (WIBs)
• All funds are allocated to states by formula.	• 85% is passed through to local WIBs. • 15% is used for statewide activities.	• WIBs use funds for core, intensive and training services. • WIBs can establish agreements with nonprofits as "one-stops" or as eligible training providers.

Dislocated Worker Formula Grants:

DOL, Employment and Training Administration	States	Local Workforce Investment Boards (WIBs)
• 80% of funds are allocated to states by formula. • 20% is used for National Emergency Grants, demonstration projects and TA.	• 60% is passed through to local WIBs. • 25% is used for State Rapid Response Activities. • 15% is used for statewide activities.	• WIBs use funds for core, intensive and training services. • WIBs can establish agreements with nonprofits as "one-stops" or as eligible training providers.

In addition, states that exceed set performance targets in Title I, Title II (Adult Education and Family Literacy Act) and Career and Technical Education (Perkins Act) receive WIA incentive grants. These grants can be used in the same way as formula funds, or "to support innovative workforce development and education activities."[36] In Fiscal Year 2010, 10 states received a total of $9.7 million in incentive grants.[37] Though these funds can be used for the same purposes as formula grants, because they are "extra" or not budgeted funds, they may be more available to community based organizations (CBOs) implementing integrated service delivery models.

Services/Program Support

Local area adult and dislocated worker funds support three categories of services, labeled as core, intensive and training services.

- **Core services** include outreach, job search and placement assistance, and labor market information. Core services are available to all jobseekers, often on a self-serve basis.

- **Intensive services** include more comprehensive assessments, development of individual employment plans and counseling, and career planning. Most components of the CWF model would be considered intensive services.

- **Training services** are targeted to unemployed individuals as well as low-income workers who require training to achieve self-sufficiency. In most cases, training must be provided through ITAs, which allow participants to select and attend their choice of training program from among eligible providers.[38] One exception to the use of ITAs for training is when a training program is run by a private or community based organization that has demonstrated effectiveness in services to special populations with barriers to employment.

Grant amounts passed through to WIBs fund local plans and providers. Most frequently, these funds are expended by public agencies running one-stops, rather than by public or nonprofit groups providing training opportunities. Local WIBs also designate eligible training providers, who offer training to individuals using their ITAs to pay for program fees.

A nonprofit can receive WIA funding in a number of ways:

- Operating a full-fledged WIA one-stop center. Examples of nonprofits that have done this are Seedco in New York City and Instituto del Progreso Latino in Chicago;
- Operating a "satellite one-stop," a center that provides a more limited set of services to job seekers;
- Providing core or intensive services by contract;

- Becoming an eligible training provider that can receive program reimbursement through ITAs; or
- Receiving a contract to provide a training program for a special population with barriers to employment.

Of these options, contract services are the best fit for organizations using the integrated service delivery approach, as they allow for a customized program that includes a more complete package of support services to be provided to the entire cohort of trainees. Some organizations who have received contracts have been able to hire case managers to serve training program participants.

The 15 percent set aside from state formula funds for both adults and dislocated workers, also called "state discretionary funding," is a much more flexible funding source than local area pass-through funds. These funds are more flexible because they are not subject to performance standards or a required pass-through to local WIBs (although states may choose to allocate funds to WIBs). These features make state discretionary funding appropriate for the integrated service delivery providers. If a local WIB does not fund integrated service delivery, organizations can seek support from state departments overseeing WIA.

Program Limitations

WIA funds are quite limited relative to the number of individuals who could benefit from services, and they are mostly expended by public agencies to run one-stops or provide ITAs. Given this limited funding, in most cases where one-stops offer access to supportive services, they do so with private funding or through a partnership with a human services agency, rather than with WIA dollars.

CBOs may experience challenges in accessing funds, as the extent to which nonprofit organizations are able to enter into agreements to provide core or intensive services depends on the goals and outlook of state agencies and local WIBs. Some states are more open than others to allowing CBOs to operate satellite one-stops.

Title I of the Workforce Investment Act has built-in, performance standards based on labor market outcomes. Programs providing WIA services are not able to be certified without meeting these standards. This creates disincentives to serve less-educated and disadvantaged individuals because these individuals are less likely than higher-educated or higher-skilled individuals to achieve strong labor market outcomes. State discretionary funds are more flexible as they are not subject to performance standards, but these funds constitute only a small percentage of the total allocation for each state.

In order to receive ITA funding to train job seekers, a CBO must be designated as an "eligible provider" of workforce training. This can be a lengthy and administratively complex process that requires providers to demonstrate results through reporting outcomes for all participants in a training program.

State Allocations and Contacts

For state allocations of WIA Title I adult worker funds, see: http://www.doleta.gov/budget/docs/10adu$.pdf.
For state allocations of WIA Title I dislocated worker funds, see:
http://www.doleta.gov/budget/docs/10dw$.pdf.

A list of state WIA contacts can be found at: http://www.doleta.gov/usworkforce/statecon.cfm Eligible training providers by state can be found at: http://www.careeronestop.org/wiaprovidersearch.asp.

Workforce Investment Act (WIA) -- Title I, Youth

A portion of funds under Title I of the Workforce Investment Act (WIA) are reserved for services for disadvantaged youth, with the intent of providing comprehensive interventions that prepare them for labor market and postsecondary success. WIA youth activity funds are allocated through formula grants to states, with most funds passed through to local workforce investment boards (WIBs). Through a competitive process, WIBs fund providers to offer individualized workforce education and employment assistance to disadvantaged youth. While the target population is narrow, the range of services that can be funded is broad, including many elements of integrated service delivery.

Elements of Integrated Service Delivery

Infrastructure		Core 1: Employment and Career Advancement		Core 2: Income Enhancements and Work Supports		Core 3: Financial and Asset Building	
Case Management	●	Job Training	●	Tax Preparation		Financial Coaching	●
Research & Evaluation	●	Case Management (for employment)	●	Income Supports	●	Savings and Asset Building Programs	
Technology		Job Retention Support	●	Supportive Services/ Human Services Referrals	●		
				Financial Aid	●		

State and Nonprofit Examples

San Diego School-to-Career Youth Council, San Diego, California: The School-to-Career Youth Council, an entity staffed by the San Diego Workforce Council and reporting to the local WIB, employs a countywide system of services to youth through a network of youth service agencies, schools and one-stop career centers. It connects youth to employment and training opportunities through the San Diego Youth Resource Mapping Project, a database of organizations that provides core education and employment services, and employs a supportive services component with case management for each youth participant. It also partners with the San Diego Community College District to administer a career pathways program for WIA-eligible youth. In the program, youth receive WIA supportive services case management as well as counseling and support from the College. Each participant receives $800 to help pay for transportation, child care and other expenses. The Council has been recognized for its sophisticated understanding of the diverse needs of disconnected youth.

Capital Workforce Partners, Hartford, Connecticut: Capital Workforce Partners, Hartford's Workforce Investment Board, is a regional consortium that coordinates a comprehensive and coordinated set of youth development services provided by public and private partners and service providers. Capital Workforce Partners is unique in its level of engagement with regional employers and municipalities.[39] Its Youth Employment and Learning Program is notable because it administers an integrated set of year-round services for youth, aimed to keep students engaged by utilizing project based learning and exploration, providing supports in the work environment and connecting youth to jobs.

Eligibility and Targeting

To be eligible for the WIA youth program, a young person must be between the ages of 14 and 21,[40] low-income, and have at least one of following barriers:

- Be deficient in basic literacy skills;
- Be a school dropout;
- Be homeless, a runaway, or a foster child;
- Be pregnant or a parent;
- Be an offender; or
- Require additional assistance to complete an education program or to secure and hold employment

The maximum household income for participation is set by statute at 70 percent of the lower living standard income level. This standard varies by region and metropolitan area, and ranged from $21,393 to $34,648 in 2010.[41] At least 30 percent of formula funds must be devoted to out-of-school youth. "Out of school youth" does not include youth who are enrolled in any school or alternative education program at the time of registration.

WIA youth program funds are allocated to states and outlying areas through formula grants. The majority of these funds, 85 percent, are passed through to local WIBs. The remaining allocation is set aside for state administrative costs and discretionary purposes. State administrative and discretionary funding is not subject to performance standards. In most cases, WIBs contract with youth-serving organizations rather than provide services directly through the one-stops. In order to be considered for WIA youth program contracts, organizations must participate in a competitive process that is informed by a local youth council.

Youth Formula Grants:

DOL, Employment and Training Administration	→	States	→	Local Workforce Investment Boards (WIBs)
• Funding is allocated to states by formula for youth education and training.		• 85% is passed through to local WIBs. • 15% is used for statewide activities.		• WIBs allocate funds through a competitive process to youth serving organizations.
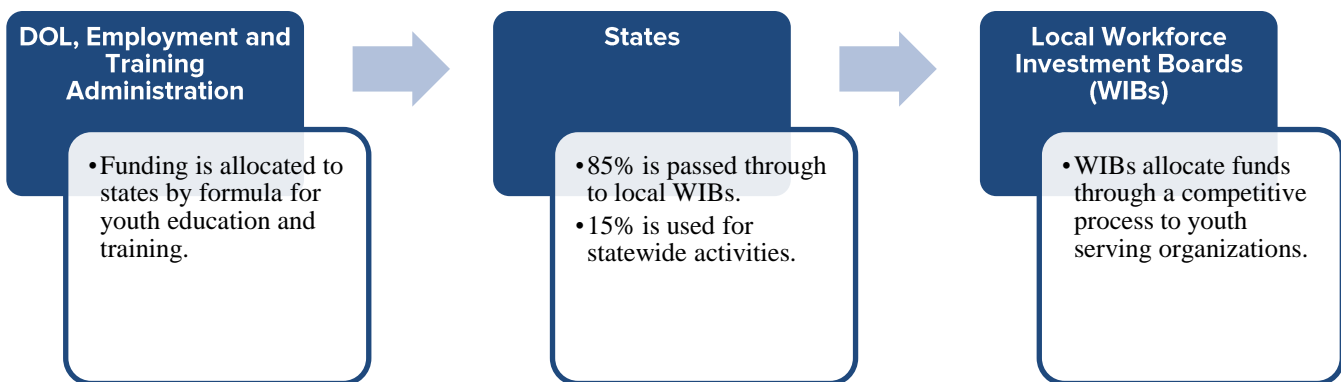
Services/Program Support

WIA youth program funds are intended to be used by local service providers to deliver comprehensive services to low-income youth to address the deficits in their academic, labor market and personal skills, and prepare them for labor market success. Many youth are out of school and in the labor market. Many are young parents. To the extent possible, WIA youth providers are to "have contact with youth over substantial periods of time" and be "able to offer reliable information about the needs and problems of youth."[42] While WIA youth activity grants have a narrow target population, the set of activities provided to them is broad and includes opportunities for training, supportive services, benefits access including financial literacy, and comprehensive guidance and counseling.

Providers must develop individualized plans for youth program participants, including a description of the supportive services the program will provide. Plans may include preparation for postsecondary education,

linkages between academic and occupational learning, preparation for unsubsidized employment opportunities, and effective connections to intermediaries with strong links to the job market and to local and regional employers. These services are often bundled for youth. Additionally, the Workforce Investment Act sets forth a set of youth activities that shall be provided. These activities support dropout prevention and secondary school completion and allow summer employment opportunities that link to academic and occupational learning, as well as other occupational training, leadership development and adult mentoring opportunities.

The most likely way for WIA youth activity funds to support integrated service delivery would be for an existing youth services provider to bundle income enhancement, work supports, financial education and asset building with its existing workforce services. Existing Center for Working Families (CWFs) and other integrated service delivery providers with the capacity to serve disconnected youth comprehensively could also compete to become WIA youth providers.

Many local WIBs leverage and integrate WIA youth funding with resources from other systems – education, justice, foster care and foundations, to provide the comprehensive interventions needed to serve the most difficult populations. Some progressive states are using resources allocated to school districts based on students' average daily attendance (ADA) to reconnect dropouts to non-traditional supported education and training environments leading to secondary credentials and preparing them for labor market success. Strategies like these may be the best ways to serve WIA eligible youth within integrated service delivery models.

Program Limitations

WIA youth funds are extremely limited relative to the number of disconnected youth that could benefit from them. Because of the stringent income requirements, funds are mostly expended on those at the very bottom of the income spectrum. This helps to target funds to the most needy, but also makes it more complicated to blend youth funds with other resources that serve a broader population.

To receive WIA youth funding, providers must demonstrate a history of success serving youth and achieving specific performance outcomes. Funds are often channeled to strong organizations in multi-year contracts. This could make it difficult for new vendors with less experience to compete. Nonetheless, integrated service providers with strong programmatic interventions and supports may fare well in the local competition for these funds, especially if they partner with youth-focused organizations or can otherwise demonstrate that they have the ability to reach the target population. Priorities and guidelines for local procurements vary from area to area.

Providers often feel a divide between the population served and WIA requirements, which are not generally adjusted to reflect service to youth with significant barriers. Thus, providers are sometimes reluctant to enroll the hardest to serve youth, who may require much longer interventions and more supportive services.

State Allocations and Contacts

For state allocations of WIA Title I youth funds, see: http://www.doleta.gov/budget/docs/10you$.pdf.

A list of state WIA contacts can be found at: http://www.doleta.gov/usworkforce/statecon.cfm .

SNAP Employment and Training

Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T; formerly known as Food Stamps Employment and Training or FSET) funds can be used to support a variety of education, training, employment, and related services for SNAP recipients. Nearly 43 million individuals receive SNAP benefits, making a large share of low-income families potentially eligible for employment and training; however, in 2009, only 6.8 percent of SNAP recipients participated.[43] In recent years, a number of states have developed processes to claim reimbursement for expenses incurred by not-for-profit organizations under contract to the state agency operating SNAP E&T, and have passed through funding to these organizations.

Elements of Integrated Service Delivery							
Infrastructure		Core 1: Employment and Career Advancement		Core 2: Income Enhancements and Work Supports		Core 3: Financial and Asset Building	
Case Management	●	Job Training	●	Tax Preparation		Financial Coaching	●
Research & Evaluation	●	Case Management (for employment)	●	Income Supports	●	Savings and Asset Building Programs	●
Technology	●	Job Retention Support	●	Supportive Services/ Human Services Referrals	●		
				Financial Aid	●		

State and Nonprofit Examples

Connecticut: Historically, Connecticut has used its 100 percent federal SNAP E&T funds to provide services in the large urban centers of Bridgeport/Norfolk, Hartford, and New Haven. In recent years, the state has also used third party match to access 50 percent reimbursement funds. In 2007, Capital Community College (CCC) became the first E&T provider to participate, with nearly 400 SNAP recipients participating in a range of short-term training programs. At the same time, the Connecticut General Assembly enacted legislation establishing SNAP Employment and Training Community Collaboratives, which include E&T providers and public and private entities convened to implement poverty reduction strategies. The Department of Social Services (DSS) must give priority to such collaboratives when selecting providers for SNAP E&T services under the 50 percent reimbursement fund. The initial Request for Qualifications was posted in February 2009 and DSS received 15 proposals. By March 2010, 103 Connecticut towns and cities had applied for federal funding under the SNAP E&T program.[44] However, due to the review process discussed below, under Program Limitations, Connecticut has not yet received any 50 percent SNAP E&T funding for the collaborative.

Maine: Maine has recently received approval to use SNAP E&T funds to expand access to the Competitive Skills Scholarship Program (CSSP), which covers tuition and fees (that are not covered by public grant and scholarship programs), transportation, child care, and other support services for students with family incomes up to 200 percent of the federal poverty level. A full-time student can receive as much as $7,500 a year. CSSP supports students seeking a range of different degrees and credentials, including two-and four-year post-secondary credentials and degrees and shorter-term credentials, as long as they prepare students for high-wage, high-demand jobs. CSSP is primarily funded via employer payroll contributions but only has the capacity to serve about 300 participants per year. Because of the limited funding for the underlying program, the Food and Nutrition Service (FNS) approved claiming SNAP E&T funds to expand this program for SNAP participants.

Vermont: Vermont's SNAP E&T job readiness activities include driver education, parenting skills, job assessment, financial management, and career planning. Services are provided by the Department of Labor for mandatory participants, but by parent-child centers and Vermont Adult Learning staff for voluntary participants. Under self-employment training, community action agencies provide workshops on business plan development, financing, marketing and other essentials to running a small business.

Eligibility and Targeting

Funds go from the Food and Nutrition Service (FNS) to the state agency that operates the SNAP program. States must submit a plan for their SNAP E&T funds to the FNS, and may contract with other state or local agencies or private organizations to provide services to participants or to operate the entire program.

Participants must be recipients of SNAP benefits in every month that they receive services, and may not be Temporary Assistance for Needy Families (TANF) recipients. Youth (ages 16 to18) may participate in employment and training services if they are members of a SNAP household.

In general, SNAP recipients must have gross monthly incomes under 130 percent of the federal poverty level and have assets under defined limits. In some states, services are further targeted to "able bodied adults without dependents" (ABAWDs) who are at risk of losing SNAP eligibility if they are not participating in a work-related activity. Some SNAP recipients are "mandatory participants" and must participate in E&T services or risk losing SNAP benefits to sanctions. States may also serve voluntary participants, and some states run entirely voluntary programs. Some states impose additional target criteria, such as geographic regions.

Federal Funding: $351 million in FY 2008, estimated to rise to $375 in FY 2010.

Type of Program: Formula grant to states, with additional funding available as a partial reimbursement of program expenditures.

Agency with Jurisdiction: U.S Department of Agriculture (USDA), Food and Nutrition Service (FNS).

Match Required: Each state receives a limited allocation of federal funds. States may receive 50 percent reimbursement of state spending over and above this allocation.

Services/Program Support

SNAP E&T supports employment and training activities for SNAP recipients. Such activities can include job search, job search training, work experience, and education and training. SNAP E&T can pay for such services. Employability assessments and case management services can be part of a component but cannot be stand-alone activities.

The federal government will share half the cost of reimbursing recipients for a wide range of expenses related to participation in a SNAP E&T component, including dependent care, transportation, uniforms, books, safety equipment, interview clothing, test fees, supplies, etc. (Such reimbursements cannot be paid for with 100 percent federal funds.)

In a provision added by the Food, Conservation and Energy Act of 2008 (P.L. 110-234), SNAP E&T funds can also be used to provide job retention services for up to 90 days after an individual who received employment and training services under SNAP E&T gains employment. FNS has not issued rules regarding what exactly may be covered as job retention services, which leaves this to state discretion, subject to FNS approval of the state E&T plan.

In the past, states mostly claimed reimbursement for direct state and local expenditures under the 50 percent reimbursement funding stream, but in recent years, a number of states have developed processes to claim expenses incurred by community colleges and other not-for-profit organizations under contract to the state

agency operating SNAP E&T (sometimes referred to as "third-party match" programs). These programs must enhance services available to SNAP E&T participants and not supplant existing spending.

Non-Federal Funds

The SNAP E&T program includes two main types of funding:

1. 100 percent federal funds, and
2. 50 percent federal reimbursement funds.

Under the first, each state receives a capped allotment of 100 percent federal funds to provide SNAP E&T services (other than participant reimbursements), based on the number of work registrants and ABAWDs in the state. This allotment is very low compared to the total number of potentially eligible SNAP recipients, and in many states is entirely consumed by job search activities and referrals to education and training that are funded from other sources. States can also qualify for an additional allotment of 100 percent federal funds if they commit to serving all ABAWDs who would otherwise be at risk of losing SNAP benefits due to the time limit.

Under the second component, states can claim 50 percent reimbursement for non-federal spending on SNAP E&T activities. This is not capped. To draw down these funds, states must include a description of these activities and a proposed budget in a SNAP E&T plan. The plan must be approved by the FNS at USDA. Third party expenditures may be claimed as state spending for this purpose, contingent upon approval by FNS.

Program Limitations

Historically, SNAP E&T programs were designed to provide an activity for unemployed participants who were mandated to participate in a SNAP E&T program to maintain food stamp benefits; these programs have not necessarily been robust education and training offerings. There is no statutory or regulatory limit on how long a SNAP E&T component may last, but it is clear that USDA staff think of the program as providing short-term skills training for unemployed individuals. However, the Food, Conservation and Energy Law of 2008 clarified that individuals may volunteer to participate for more than 30 hours a week. (Some state SNAP E&T programs are completely voluntary.) This flexibility allows SNAP E&T funds to be used for more robust education and training activities for individuals who are currently employed in low-wage jobs.

Federal law requires that federal grant programs, including the SNAP E&T program, cannot be charged more for services than the general public pays. Therefore, when states consider which expenses to claim for the 50 percent reimbursement, it is critical to ensure these expenses are consistent with what the public pays or what is charged to other federal, state, or local grants. Student tuition, mandatory student fees, case management, course books, transportation and child care are generally considered allowable expenses. Funding a state provides to an institution to cover expenses is not reimbursable, even if allocated on a per-student basis.

As noted in a March 18, 2010, memo[45], FNS is particularly concerned that SNAP E&T is being charged more than the general public for the same services. For example, California community colleges sought SNAP E&T third-party 50 percent federal reimbursement funds for the "full-time equivalent" student amount colleges receive from the state, which reflects the full costs of educating students. However, FNS rejected this approach, indicating colleges should use the tuition and fees charged to the students for the reimbursement claim. In California, the tuition and fees charged are significantly lower than the true cost of community college education. FNS has similarly challenged the cost basis for Washington State's claiming of community college expenses.

FNS also is concerned that SNAP E&T funds not supplant existing funding for education and training activities. Participants must be assessed for appropriateness and enrolled in SNAP E&T programs to receive services and

be counted toward the reimbursement; they cannot be assumed to be eligible for services based on SNAP receipt. States are more likely to receive approval to use SNAP E&T funds for a new program, or when a state can demonstrate that an existing program does not have the capacity to serve all eligible participants and that the SNAP E&T funds will allow additional SNAP recipients to be served. In such cases, FNS may approve SNAP E&T funding for newly enrolled participants only.

As noted above, participants must be SNAP recipients in every month during which they receive SNAP E&T services. It is not sufficient to simply establish SNAP receipt at the start of the program; states must develop a process for checking SNAP status on an ongoing basis and allocating costs correspondingly.

FNS recently has been closely reviewing SNAP E&T plans for compliance, particularly those that use third-party expenditures on education to draw down 50 percent reimbursement funds. Concerns about supplantation and excess costs are particularly likely to arise when SNAP E&T participants are being served along with non-participants with blended funding.

To resolve these issues, many states have needed significant dialogues between program operators, state SNAP agencies, and FNS. These dialogues have been burdensome for state SNAP agencies, which are experiencing increased demand for services and staffing shortages, and for whom education and training is not their primary mission. Consequently states have experienced significant delays (up to 18 months) before receiving reimbursement. FNS is soon expected to release updated guidance addressing these issues.

State Allocations and Contacts

SNAP is typically operated by state human services agencies or child and family services agencies. A list of state agency websites is available at: http://www.cbpp.org/cms/index.cfm?fa=view&id=618.

Employment and Training programs may be contracted to state workforce agencies.

SNAP E&T state allocations for FY 2010 and 2011 is available at:
http://www.clasp.org/admin/site/documents/files/FY-2010_2011-allocations.xlsx

TRIO Student Support Services (SSS)

Student Support Services (SSS) grants are meant to enable institutions of higher education to provide supportive services to disadvantaged students, including those who are first in their families to attend college, are low-income, or have disabilities. The program is one of eight "TRIO" programs administered by the U.S. Department of Education's Office of Postsecondary Education. Project grants are awarded to accredited postsecondary institutions, and must be used for academic tutoring; advice and assistance with course selection and financial aid; assistance in enrollment in four-year programs; and financial literacy counseling.[46] Funds may be used for individualized counseling that provides personal, career and academic information, activities and instruction on student career options; and mentoring programs.[47] Funds are also used as grant aid for the target population.

Elements of Integrated Service Delivery

Infrastructure		Core 1: Employment and Career Advancement		Core 2: Income Enhancements and Work Supports		Core 3: Financial and Asset Building	
Case Management		Job Training		Tax Preparation		Financial Coaching	●
Research & Evaluation		Case Management (for employment)	●	Income Supports		Savings and Asset Building Programs	
Technology		Job Retention Support		Supportive Services/ Human Services Referrals	●		
				Financial Aid	●		

State and Nonprofit Examples

Southeast Arkansas College (SEARK): The SSS grant does not directly support the Center for Working Families (CWF) at SEARK, but the SSS program and the CWF collaborate to provide a similar set of integrated and comprehensive services, and cross-refer to better serve all participating students. The SSS program offers a broad range of services, including opportunities for academic development, assistance with college requirements, and services to motivate students to complete their education.[48] The program also provides students with tutoring, individual education plans and financial literacy. All students receive information about the services provided by the SSS program and the CWF during a required learning strategies course students take during the first semester of enrollment. Students who are enrolled in the CWF program are referred to the SSS program for tutoring and other services, and SSS participants are referred to the CWF. Both programs are connected to the College's Student Retention Center, overseen by the Office of Student Affairs.

Eligibility and Targeting

Institutions of Higher Education (IHE) or groups of IHEs are the only eligible applicants. SSS could be available to support integrated service delivery only if the program is based in an IHE.

Students who receive SSS resources must be accepted or enrolled in a program of postsecondary education at a grantee institution. Other eligibility requirements are:

1. Two-thirds of students in each SSS program must be low-income students who are first-generation college students or students with disabilities that require student support services. The remaining 1/3 of students must be *either* low-income or first-generation college students.[49]

2. One-third of the disabled students in each SSS program must be from low-income families.

3. Students must be in their first two years of postsecondary education and are receiving federal Pell Grants.

4. Services supported by the grant may be offered to students who have completed their first two years of postsecondary education and are receiving federal Pell Grants if the institution demonstrates that these students are at high risk of dropping out and the needs of first and second year students have been met.[50]

The activities in this program are also meant for disadvantaged students, for whom English is not a first language, students who are homeless, are in or are aging out of foster care, or are otherwise disadvantaged. It is not required to serve specific percentages of these groups. SSS grants can serve students of any age.

<aside>
Federal Funding: Fiscal Year (FY) 2010 funding is estimated to be $301 million. This is slightly lower than the FY 2009 level. During that year, the allocation was approximately $1,500 per student.

Type of Program: Project Grants to Institutions of Higher Education (IHEs).

Agency with Jurisdiction: U.S Department of Education, Office of Postsecondary Education (OPE).

Non-federal Funds: Of the portion of funds used as grant aid for students, there is a one-third matching requirement, unless grantee is eligible to receive funds as a historically black college or university, a Hispanic-serving institution, or as an institution servicing native Hawaiians or Native Alaskans.
</aside>

Services/Program Support

Grant funds are aimed at the specified populations described above, and used for student support services that encourage them to remain in school. Services include:

1. Academic tutoring, both direct and through other services;
2. Advice and assistance in choosing postsecondary courses;
3. Information on federal student financial aid programs and benefits (including federal Pell Grants and loan forgiveness, as well as resources to access private scholarships);
4. Assistance in completing financial aid applications, including the Free Application for Federal Student Aid (FAFSA);
5. Education and counseling services designed to improve financial literacy of students, including financial planning for postsecondary education;
6. Assistance in completing applications for enrollment in graduate and professional programs, and in receiving financial assistance to attend such programs.

As of 2000, Section 402D of the Higher Education Act of 1965 was amended to allow SSS grantees to provide grant aid to students already participating in the SSS program who are receiving Pell Grants.[51] These students may receive grant aid not exceeding the amount they receive in Pell Grants. If the institution is able to demonstrate the students who have completed more than the first two years of a degree are at risk of dropping out, these students are also able to receive SSS grant aid.[52] Grantees are required to contribute matching funds of not less than 33 percent for all funds used as grant aid for students. The exceptions to this requirement are grantees that are historically black colleges and universities, Hispanic-serving institutions, or institutions serving Alaska Natives or Native Hawaiians.[53]

The authorizing legislation also lists a set of permissible, but not required, services. Allowed activities are:

- Individual counseling for personal, career and academic matters;
- Information, activities and instruction designed to help students understand potential career options;
- Mentoring programs involving faculty or upper class students; and
- Assistance in securing temporary housing during breaks from the academic year for students who are homeless children and youths, or in or aging out of foster care.

Program Limitations

While many of the uses of SSS grants are within the purview of Centers for Working Families, only postsecondary institutions can access these grant funds. In addition, students must be assessed to determine that they meet the eligibility requirements. If a provider serves a broader population, it must track use of funds to assure that SSS is not charged for services provided to ineligible students.

Grantees and Application Process

Grant competitions for SSS do not take place every year, as grantees receive funding for up to 60 months. The most recent SSS grant competition took place in Fiscal Year 2010. The grant announcement is available at: http://www2.ed.gov/legislation/FedRegister/announcements/2009-4/102209b.html. The list of 2010 grantees has not yet been released.

For more information about the application process, contact the Department of Education at TRIO@ed.gov.

TRIO Educational Opportunity Centers (EOC)

Education Opportunity Center (EOC) grants are allocated to postsecondary institutions, state and local education agencies, and nonprofit and other community organizations to provide counseling and information on college admissions and continuing education to adults who want to pursue higher education. EOCs are also meant to promote financial literacy among this group.[54] The purpose of EOC is to increase the number of low-income students, first generation college students and disabled students who enroll in postsecondary education. The program is one of eight "TRIO" programs administered by the U.S. Department of Education's Office of Postsecondary Education.

Elements of Integrated Service Delivery							
Infrastructure		**Core 1: Employment and Career Advancement**		**Core 2: Income Enhancements and Work Supports**		**Core 3: Financial and Asset Building**	
Case Management		Job Training		Tax Preparation		Financial Coaching	●
Research & Evaluation		Case Management (for employment)		Income Supports		Savings and Asset Building Programs	
Technology		Job Retention Support		Supportive Services/ Human Services Referrals			
				Financial Aid	●		

State and Nonprofit Examples

Connecticut Talent Assistance Corporation (CONNTAC): The sole Educational Opportunity Center grantee in Connecticut, the Connecticut Talent Assistance Corporation, runs its EOC as a collaborative venture with the Connecticut Regional Community College System. The organization has received the grant since 1980. Through the EOC, CONNTAC provides client educational assessments, career and academic counseling and guidance, college tutorial services, and financial aid information in satellite offices at ten Connecticut community colleges.[55]

Malcolm X Community College EOC, Chicago, Illinois: One of two Educational Opportunity Centers in the city of Chicago, the EOC at Malcolm X Community College helps students understand the range of postsecondary options by providing financial aid and college admissions information, as well as career and educational counseling and advisement. Counselors connect with students by setting up shop in GED, ESL and adult basic education classrooms, secondary schools, libraries and community organizations. EOC does not provide integrated services, but it does refer students to organizations that can provide transportation and child care subsidies, health and dental insurance, financial literacy and other emergency assistance. The EOC collaborates with dozens of community organizations including some that administer Center for Working Families (CWFs) in Chicago. The downside of this broad reach is that most individuals served by the EOC receive only one or two counseling sessions and do not remain connected to the Center over time.[56]

Eligibility and Targeting

Grants that support Educational Opportunity Centers are allocated through a competitive process for five year periods to an array of organizations, including:
- Postsecondary institutions;

- State and local education agencies; and
- Nonprofit and other community organizations.

EOC grants can serve schools only if they are not already served by TRIO's Talent Search program.

Students served by EOCs must older than 19 years of age and two-thirds must be both low-income and potentially first-generation college students.[57] For all TRIO programs, "low income" students are defined as those whose family's taxable income for the preceding year did not exceed 150 percent of the federal poverty level.[58] Additionally, the program targets those who are limited English proficient; traditionally underrepresented in postsecondary education, including those who are disabled; homeless children and youths; in foster care or are aging out of the foster care system; or veterans.[59]

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Federal Funding: Fiscal Year (FY) 2010 funding for EOCs is estimated to be $46.8 million. 124 programs will be funded. A total of 125 programs were funded in FY06, the year of the last grant competition.

Type of Program: Competitive grants

Agency with Jurisdiction: U.S. Department of Education (Ed), Office of Postsecondary Education (OPE).

Non-federal Funds: No match is required.

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Services/Program Support

Funds are used to provide resources, information and counseling to adults interested in seeking postsecondary education. Unlike other TRIO programs, there are no required services. However, postsecondary enrollment, financial aid, and career information can be provided through:

1. Academic advice or personal counseling;
2. Career workshops;
3. Information about postsecondary education opportunities and financial aid;
4. Assistance in completing applications for admission to postsecondary institutions, for testing or for financial aid;
5. Coordination with postsecondary institutions;
6. Efforts to engage the community through media; and
7. Financial literacy, tutoring, mentoring or counseling.

Financial and economic literacy services were added as eligible activities for Educational Opportunity Center grantees in the 2008 reauthorization of TRIO programs. The final rule defines "financial and economic literacy" as knowledge about personal financial decision-making and includes six subject areas: personal and family budget planning; credit building principles; planning for secondary education; cost of college attendance; financial assistance; and how to complete the Free Application for Federal Student Aid (FAFSA).[60]

Program Limitations

EOC program grants are allocated to a significant number of community-based organizations, which makes them appropriate funding sources for CWFs serving low-income adults. However, potential applicants should note that entities currently operating EOCs receive a significant advantage in re-applying, which reduces the likelihood that new organizations will receive grants.[61] Competitions for EOC grants also only take place every five years, with no opportunity to obtain new funds between competitions.[62]

Grantees and Application Process

For a list of current grantees, see: http://www2.ed.gov/programs/trioeoc/eocgrantees2009.pdf.

The next grant period was set to begin in FY 2011, but release of the grant application, which would typically take place during the summer or fall of 2010, has been delayed due to new provisions in the EOC program

included in the Higher Education Opportunity Act of 2008 (HEOA). Rules are now finalized, but grant applicants are still receiving a one-time extension of the EOC grant to develop an understanding of those rules. Grants set to expire at the end of 2010 will now run through August 31, 2011. The EOC funding announcement has not yet been posted. Interested parties should look for the announcement at: http://www.grants.gov or http://www2.ed.gov/programs/trioeoc/applicant.html.

College Access Challenge Grant (CACG) Program

The College Access Challenge Grant Program (CACG) was created to "foster partnerships among federal, state, and local governments and philanthropic organizations through matching challenge grants that are aimed at increasing the number of low-income students who are prepared to enter and succeed in postsecondary education."[63] Grants provide resources to educate both adolescent and adult learners about postsecondary opportunities, financial aid, applications and enrollment. Funds can be used to assist students to gain access to postsecondary opportunities and achieve postsecondary success through public information sharing, online outreach, and case management. They can also be used as grant aid for students. Grants are administered by state agencies that oversee higher education and, when there is no appropriate agency in a state, philanthropic organizations. Thus, in order to gain access to this funding source, integrated services providers would need to apply for sub-grants from the designated lead agency.

Elements of Integrated Service Delivery

Infrastructure		Core 1: Employment and Career Advancement		Core 2: Income Enhancements and Work Supports		Core 3: Financial and Asset Building	
Case Management		Job Training		Tax Preparation		Financial Coaching	●
Research & Evaluation		Case Management (for employment)	●	Income Supports		Savings and Asset Building Programs	
Technology		Job Retention Support		Supportive Services/ Human Services Referrals			
				Financial Aid	●		

State and Nonprofit Examples

Board of Regents of the University System of Georgia: As the lead agency for the Georgia College Access Plan, the University System's Board of Regents has focused on promoting postsecondary access and success by creating a "dual pipeline," for Preschool-12 students and adults at risk of failing to complete college. This includes people who have historically experienced barriers to accessing higher education, such as those who speak English as a second language. To carry out its plan, the Board launched GACollege411, a website that provides information about paths to higher education. The site has a series of modules that convey information about career, high school and higher education planning and financial aid. The Board has also partnered with nine organizations, including groups that integrate services such as the United Way of Metropolitan Atlanta; the Georgia Family Connection Partnership and the Technical College System of Georgia, to provide postsecondary information and support.

Montana Department of Labor, Industry and Workforce Services: In order to foster collaboration between the education and workforce systems, Montana designated its state Department of Labor and Industry the lead agency for the CACG program. In its 2010 project period, the Department will work with educational partners, including the Montana University System, to engage traditional aged students, adults and dislocated workers in activities that focus on postsecondary access and success. Namely, it will provide resources to train one-stop staff members to assist prospective students complete the Free Application for Federal Student Aid (FAFSA). It will also fund the Montana Career Information System, expand its online college access tool, coordinate need-based scholarships for workforce training programs and build up an existing program that assists low-income college students gain work experience through internships.

Co-Opportunity, Hartford, Connecticut: The Connecticut Department of Higher Education has partnered with four organizations to provide information and application assistance with the FAFSA. Co-Opportunity is an integrated services provider in Hartford that also serves as the lead VITA site in the city. With resources from the CACG, Co-Opportunity integrates information about FAFSA into its free tax preparation service. This additional information enables the organization to better serve participants; brings in a new group of tax filers to learn about the Earned Income Tax Credit (EITC) and integrated services; and helps them respond to the trend of commercial tax preparers including FAFSA assistance as a service.

Eligibility and Targeting

The College Access Challenge Grant program is relatively new, first funded in the Higher Education Opportunity Act of 2008. Grants are targeted at traditionally underrepresented students, and are allocated to the state agency with jurisdiction of higher education or another agency determined by the Governor. When an appropriate agency does not exist, philanthropic organizations may also apply for grants through the program.

Grant allotments are determined by a formula based on the state's size and percentage of children (aged 5-17) and adults (aged 15-44) that fall below the poverty line.[64] The funding formula sets aside a 1% minimum for each funded entity. With the program funded at $150 million per year from Fiscal Year (FY) 2010 to FY 14, each participating state or territory will receive an annual appropriation of at least $1.5 million.

Each grantee has a matching requirement of not less than 1/3 of costs. Smaller units of government and community groups that existed before September 27, 2007 and participated in activities and services related to increasing access to higher education, can gain access to these funds as sub-grantees.[65]

> **Federal Funding:** CACG was funded at $66 million in Fiscal Year (FY) 2008 and FY09 as a mandatory program; with a significant increase to $150 million for FY10 through FY14 in the Health Care and Education Reconciliation Act of 2010 (HCERA).[1]
>
> **Type of Program:** Formula grants to state agencies and philanthropic organizations, with the ability to pass through to local nongovernment entities.
>
> **Agency with Jurisdiction:** Department of Education, Office of Postsecondary Education.
>
> **Non-federal Funds:** Grants cover 2/3 of program costs; grantees are expected to cover 1/3.
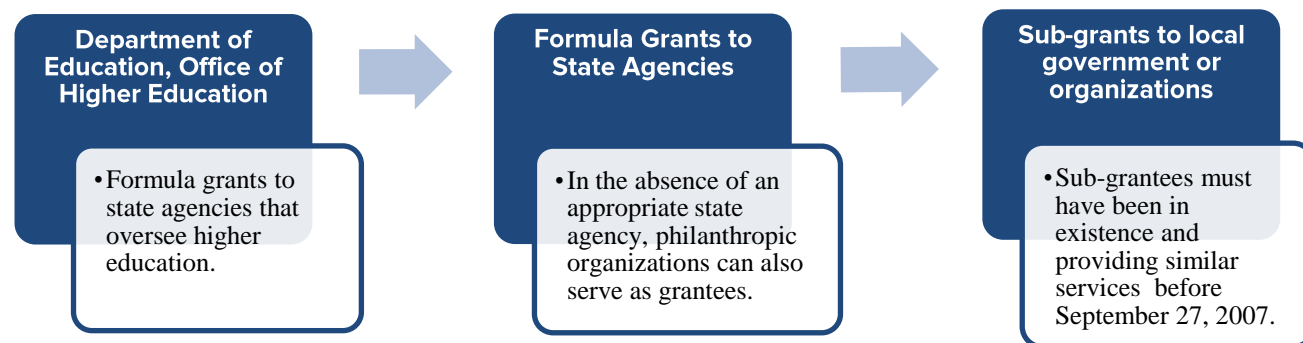
The CACG program also includes a Maintenance of Effort (MOE) requirement for states that requires them to continue previous levels of spending on education at public postsecondary institutions and for financial aid at private postsecondary institutions, so that CACG funding does not supplant state funds. [66]

Department of Education, Office of Higher Education	→	Formula Grants to State Agencies	→	Sub-grants to local government or organizations
• Formula grants to state agencies that oversee higher education.		• In the absence of an appropriate state agency, philanthropic organizations can also serve as grantees.		• Sub-grantees must have been in existence and providing similar services before September 27, 2007.

Services/Program Support

College Access Challenge Grant Funds are meant to assist in:

1. Disseminating information to students and parents about the benefits of postsecondary education and the educational opportunities available to them.
2. Planning for postsecondary education and career preparation.
3. Identifying financial aid options for postsecondary education and promoting <u>financial literacy and debt management</u> for students and families.
4. Filling out the FAFSA or other financial reporting forms, and identifying need based grant aid for students.
5. Training and development for guidance counselors as well as financial aid administrators and college admissions counselors to improve their capacity to assist students in a set of areas, including:

    a. Understanding entrance requirements, and state eligibility requirements for specific federal grants that provide assistance based on student coursework;
    b. Applying to institutions of higher education and applying for financial assistance from state, local and private sources of financial assistance and scholarships;
    c. Increasing knowledge of activities that increase students' ability to successfully complete coursework for a postsecondary degree, including tutoring or mentoring;
    d. Assisting students to improve secondary school students' preparedness for postsecondary entrance exams.

6. Facilitating student loan cancellation or repayment or interest rate deductions for borrowers who are employed in a high-need geographical area or a high need profession in the State.

As previously mentioned, the CACG program targets students traditionally underrepresented in postsecondary education. However, the specific definition of "underrepresented" is not provided in the law. There is no additional guidance about the proportion of students who must be low-income who must be served. This is likely because, with the exception of grant aid to students who qualify for Pell Grants, eligible activities are not provided for specific students, but as resources that can serve them such as outreach materials and training of guidance counselors and other professionals to provide services.

Additionally, though middle and high school students are not the explicit targets of the program, and there are instances of states targeting adult and other nontraditional learners, the program provides incentives for grantees that serve high school students. Namely, the performance measures that grantees must address in required, annual performance reports are almost exclusively related to the outcomes of high school seniors such as their filling out the FAFSA and their enrollment in postsecondary education within a year of graduation.[67]

Program Limitations

Grants may be difficult to access as sub-grantees, particularly in states that did not focus their program proposals on adults and dislocated workers. They are targeted towards low and moderate income individuals. Many of the performance measures written into the statute, including the number of students who fill out the FAFSA and the number of students who enroll in postsecondary education, incentivize funds use on traditional aged students.

State Allocations and Contacts

An abstract of each state's program, with grant size and state contacts can be found at:
http://www2.ed.gov/programs/cacg/cacgabstracts2010.pdf

Contact people at the Department of Education can be found at:
http://www2.ed.gov/programs/cacg/contacts.html

SNAP Outreach Funding

Under the Supplemental Nutrition Assistance Program (SNAP, formerly known as the Food Stamp program), states may conduct outreach, screening and application assistance activities and receive 50 percent federal reimbursement. States may contract with nonprofit organizations to provide outreach services and may also claim non-federal funds spent by nonprofits for reimbursement. While SNAP outreach funds may only be used for outreach and screening for SNAP, agencies can develop a methodology for assigning a portion of the costs of multi-benefit outreach and screening.

Elements of Integrated Service Delivery

Infrastructure		Core 1: Employment and Career Advancement		Core 2: Income Enhancements and Work Supports		Core 3: Financial and Asset Building	
Case Management		Job Training		Tax Preparation		Financial Coaching	
Research & Evaluation		Case Management (for employment)		Income Supports	●	Savings and Asset Building Programs	
Technology	●	Job Retention Support		Supportive Services/ Human Services Referrals			
				Financial Aid			

State and Nonprofit Examples

Ohio Benefit Bank: The Ohio Benefit Bank conducts outreach and screening for a range of income support programs, including SNAP (Food Assistance), cash assistance (Ohio Work First), Medicaid and children's health insurance, child care subsidies, energy assistance, tax credits and financial aid. It is implemented by the Ohio Association of Second Harvest Foodbanks (OASHF), with outreach and screening conducted by faith-based and community groups and public agencies at sites across Ohio. OASHF has determined that 70 percent of questions asked on the screening tool are required to assess eligibility for SNAP benefits; therefore, 70 percent of the costs of the screening are claimed as SNAP outreach expenses. These activities are included in the state's approved SNAP outreach plan. The 50 percent non-federal funds come from state general revenues provided to the Ohio Benefit Bank and from private foundations.

California Association of Food Banks (CAFB): CAFB manages California's SNAP outreach activities. The outreach plan includes activities of community partners, including food pantries. Community partners are reimbursed 33 cents for each dollar spent on SNAP outreach. The state retains the remaining 17 cents of federal reimbursement to support activities such as the statewide food stamp information line. The plan also includes activities of the 2-1-1 agencies which provide screening and referral to multiple benefits. 2-1-1's cost portion was determined through a time study, showing that the 2-1-1 agencies spent at least $12 on the SNAP portion of each call that included a SNAP referral. This figure is used to calculate the SNAP share of 2-1-1 costs.

Atlanta Community Food Bank: Georgia has included nine community based organizations in the Georgia SNAP Outreach Plan, including the Atlanta Community Food Bank (ACFB). ACFB provides outreach and application assistance using the state's online COMPASS system. This system allows clients to apply for SNAP benefits and also screens for other benefit eligibility. It has two full-time staff who work on outreach and application assistance. One works as a mobile screener, bringing a computer to worksites or other locations to do on-site benefits enrollment. ACFB staff also follow-up with the state agency when applications are not approved. Georgia is adding a provider module to COMPASS, which will allow the third-party organizations to check on

the status of applications that they help clients submit. ACFB's expenses are claimed as state spending, and the state passes through the full 50 percent reimbursement.

Eligibility and Targeting

Only the state agency responsible for administering the SNAP program can receive reimbursement for administrative costs, including outreach. FNS is clear in its outreach guide that states may contract with nonprofit organizations to provide services and may enter into agreements to claim nonprofit expenditures for reimbursement.

Under a separate competitive grant program -- SNAP outreach grants—FNS has in recent years provided funding for nonprofits and public agencies other than SNAP agencies to conduct SNAP outreach. These grants are relatively small (in 2009 the maximum award was $75,000) and are targeted to populations that are underrepresented in the SNAP program, such as the elderly, working poor families, and legal immigrants.[68] In FY 2010, FNS did not award outreach grants.

> **Federal Funding:** Outreach costs claimed under SNAP administration are not reported separately. There is no statutory cap, but costs must be "reasonable and necessary."
>
> **Type of Program:** Partial reimbursement of state expenditures.
>
> **Agency with Jurisdiction:** U.S. Department of Agriculture (USDA), Food and Nutrition Services (FNS).
>
> **Match Required:** FNS reimburses states for 50% of administrative costs, including outreach expenses.

SNAP benefits are available to low-income individuals and families. These benefits are among the few income and work supports available to workers without children. In general, eligibility is limited to those with a gross monthly household income of 130 percent or less of the federal poverty line and net monthly income of 100 percent or less of the federal poverty line. However, many states have adopted categorical eligibility, which allows them to waive gross income limits and asset limits for some or all recipients.[69]

Services/Program Support

States are strongly encouraged to submit outreach plans. One of the strategies states can use to reach out to those potentially eligible for SNAP benefits is partnering with nonprofit organizations. Thus, these organizations can be reimbursed for SNAP outreach activities. Organizations must enter into agreements with their state agencies to provide SNAP outreach services and can then be reimbursed by their states from FNS funding, for 50 percent of SNAP outreach activities. Reimbursable activities include marketing efforts such as brochure distribution and on-site individual assistance, which can include SNAP application assistance, screening and/or use of online benefits tools.[70]

Non-Federal Funds

State SNAP agencies are reimbursed 50 percent for allowable administrative program costs that are "reasonable and necessary," including outreach costs. Spending claimed for reimbursement can include state agency cash, cash contributed by other non-federal public agencies, and in-kind donations from public agencies. To count, funds cannot originate from or be claimed under another federal program and cannot be used as match or maintenance of effort for another federal program, unless specifically allowed under the other program.

Private cash donations may not be claimed as part of a state agency's expenditures unless a waiver has been approved. However, when a state contracts with a private entity to provide SNAP outreach services, funds held by that entity are not considered "private cash" and do not need to be "donated" to the State agency. The contractor may spend the cash on approved outreach activities and submit its billings to the state agency. The state agency reports these expenditures and receives reimbursement from FNS. It then reimburses the contractor under the terms of the contract. Depending on what is negotiated between the state and the

contractor, the state may fully reimburse the contractor for its costs (using state money for the non-federal share), pass through the full amount of the federal reimbursement (using the contractor's funds as the non-federal share), or may retain a portion of the federal reimbursement.

Private in-kind donations such as use of space, equipment or volunteer time from private entities <u>cannot</u> be claimed. However, donations from other public entities, such as community colleges, can be claimed.

Program Limitations

States may not "recruit" individuals to participate in SNAP. This is defined as carrying out activities intended to persuade an individual who has made an informed choice not to apply for SNAP benefits to change his or her decision. Outreach workers may not "campaign" on behalf of specific applicants or recipients, but may help provide support or explain terminology as part of the certification interview.[71]

The following activities are not reimbursable with federal funds under SNAP, although they are permitted if funded through other mechanisms:

- Acting as an "authorized representative" for applying for SNAP benefits, receiving the benefits, or food purchasing; and
- Transporting clients to and from the SNAP office, or providing tokens or vouchers for transportation.

Detailed information on what costs are and are not allowable can be found in the SNAP State Outreach Plan Guidance, issued by FNS.[72] Time and effort reporting is required for all paid staff and volunteers supported by the outreach plan.

State Contacts

SNAP is typically operated by state human services agencies or child and family services agencies. A list of state agency websites is available at: http://www.cbpp.org/cms/index.cfm?fa=view&id=618

SNAP Participation Grants

The Supplemental Nutrition Assistance Program (SNAP) Participation Grant program makes grants to state agencies and their private nonprofit partners to improve access to SNAP (formerly Food Stamps) and simplify application and eligibility determination systems. While SNAP is only one piece of income enhancements and work supports, such grants can be critical sources of funding for the development of online screening and application systems, enabling nonprofits to work with states to submit electronic applications for their clients.

Elements of Integrated Service Delivery							
Infrastructure		**Core 1: Employment and Career Advancement**		**Core 2: Income Enhancements and Work Supports**		**Core 3: Financial and Asset Building**	
Case Management		Job Training		Tax Preparation		Financial Coaching	
Research & Evaluation		Case Management (for employment)		Income Supports	●	Savings and Asset Building Programs	
Technology	●	Job Retention Support		Supportive Services/ Human Services Referrals			
				Financial Aid			

State and Nonprofit Examples

Ohio SNAP Online: In FY 2009, the Ohio Department of Job and Family Services, in partnership with the Ohio Association of Second Harvest Food Banks and the Ohio Benefits Bank, received funding for the Ohio SNAP Online web-based application and change reporting system. The project expands the existing counselor-assisted electronic system offered to clients and county staff while streamlining processes by allowing clients to apply for benefits or submit changes to their current cases online. Because Ohio has a unified application for SNAP, Medicaid and TANF cash assistance, the online system provides access to all three programs. This system went live in November 2010 at https://odjfsbenefits.ohio.gov/SelfServiceSplash.jsf .

End Hunger Connecticut! (EHC!) Hartford, Connecticut: EHC!, a non-profit anti-hunger organization, in partnership with the Connecticut Department of Social Services (DSS), received in FY 2010 a grant of $91,279 to expand use of e-Fax (technology that provides for the secure transmission of data over telephone lines) to all DSS offices and to some other smaller nonprofits. When EHC! staff assist clients in applying for SNAP benefits, they may submit their documentation via e-Fax at the same time. This builds off a pilot project where EHC! worked with the Hartford, CT office to demonstrate the feasibility and value of the e-Fax process. During the pilot period, EHC! documented a 45 percent reduction in the number of cases denied for lack of required paperwork. The grant funds licenses for 15 e-Fax lines for DSS offices, the purchase of fax equipment for smaller partner organizations, and staff time for training users and evaluating the impact of the innovation.

Common Point of Access to Social Services Improvement, Georgia: In FY 2009, the Georgia Department of Human Resources received funding to improve access to SNAP benefits for eligible clients by enhancing the Common Point of Access to Social Services (COMPASS), Georgia's online application system. COMPASS allows clients to screen for all benefits and to apply for SNAP and child care subsidies. With the funding from the SNAP participation grant, the state aims to allow clients to recertify online by April 2011. The state also hopes to bring TANF and Medicaid applications online at the time. Georgia is also using the grant to support back-end processes to improve its efficiency. By the end of 2011, the state plans to have document imaging capabilities

and all files online. This will allow a caseworker in any office to start processing the next applicant in line through COMPASS, regardless of the client's county of residence, which will make better use of extra capacity in rural, low-volume offices and improve the speed at which applications are processed in high-volume offices.

> **Federal Funding:** $5 million a year. Typically, 5-7 grants are awarded each year to state agencies who administer SNAP; state or local governments; public health or educational entities or private non-profit entities.
>
> **Type of Program:** Competitive grant program.
>
> **Agency with Jurisdiction:** U.S. Department of Agriculture (USDA), Food and Nutrition Services (FNS).

Eligibility and Targeting

Eligible grantees are state agencies that administer SNAP, state or local governments, agencies providing health or welfare services, public health or educational entities, and private non-profit entities such as community-based or faith-based organizations, food banks, or other emergency feeding operations. If a grant application comes from an entity other than a State agency, it must include state endorsement of the project.

SNAP Participation Grants are meant to encourage participation in the SNAP program. SNAP benefits are available to low-income individuals and families. They are among the few income and work supports available to workers without children. In general, eligibility is limited to those with a gross monthly household income of 130 percent or less of the federal poverty line and net monthly income of 100 percent or less of the federal poverty line. However, many states have adopted categorical eligibility, which allows them to waive gross income and asset limits for some or all recipients.[73]

Services/Program Support

This grant program supports projects that simplify SNAP application and eligibility determination systems and improve access to SNAP benefits by eligible applicants. Projects must be concerned with improving the quality and efficiency of operations, and could include (but are not limited to): web-based application systems, online benefit tools, telephone or call centers or remote enrollment sites. Projects must be new and innovative to the specific state or county office where they are implemented. While this funding may not directly provide support to organizations providing integrated services, it can make their benefit access services simpler and more effective.

In FY2010, FNS gave priority to grant applications that a) included "process improvement procedures" (PIPs) to make the work of one or more local offices more efficient and effective, or b) supported partnerships between state SNAP agencies and private non-profit organizations.

No more than 25 percent of the costs of a project can support outreach activities, such as advertising, application assistance, screening or pre-qualifying applicants or out-stationing eligibility workers to attract or recruit SNAP participants. In past years, FNS has provided separate funding for outreach grants. Outreach costs are also eligible for funding as part of SNAP administrative costs.

Grants may be for project periods of up to three years.

Program Limitations

These grants are specifically aimed at improving participation in the SNAP program and applicants must show that all proposed activities will improve access to SNAP. However, as in the Ohio example, when a state uses a combined application, SNAP Participation Grants can improve processes that benefit other programs.

Grantees and Application Process

The most recent RFP under this program can be found at:
http://www.fns.usda.gov/snap/government/grants/2010-RFA.pdf

Lists of grantees and future funding announcements can be found under "Grants" at
http://www.fns.usda.gov/snap/government/program-improvement.htm

Medicaid and CHIP Outreach Funding

Under Medicaid and the Children's Health Insurance Program (CHIP), states may claim outreach, screening and application assistance activities as administrative costs and receive federal reimbursement. Medicaid administrative costs are reimbursed at 50 percent, while CHIP costs are reimbursed at a higher rate, which varies by state. States may contract with nonprofit organizations to provide outreach services, and may either pay fixed amounts or make payments on a per-enrollee basis. Costs associated with outreach and screening for other income supports may not be claimed under Medicaid or CHIP, but agencies may use this funding source for a portion of the costs of multi-benefit outreach and screening.

Elements of Integrated Service Delivery							
Infrastructure		Core 1: Employment and Career Advancement		Core 2: Income Enhancements and Work Supports		Core 3: Financial and Asset Building	
Case Management		Job Training		Tax Preparation		Financial Coaching	
Research & Evaluation		Case Management (for employment)		Income Supports	●	Savings and Asset Building Programs	
Technology	●	Job Retention Support		Supportive Services/ Human Services Referrals			
				Financial Aid			

State and Nonprofit Examples

Illinois All Kids Application Assistants: All Kids Application Agents (AKAAs) help families apply for All Kids, FamilyCare and Moms & Babies. AKAAs are community-based organizations, including faith-based organizations, day care centers, local governments, unions, medical providers and licensed insurance agents. AKAAs that are not providers or funded to provide outreach activities receive a $50 Technical Assistance Payment (TAP) for each complete application that results in new coverage. Instituto del Progreso Latino is a Center for Working Families in Chicago, and is an AKAA, but has not actively pursued TAP funding.

New Mexico Enrollment Kiosks: The New Mexico Human Services Department received a $1 million CHIP and Medicaid Outreach Grant for 2009 to 2011 to build a system of 12 "enrollment kiosks" for consumers to use to apply for these programs online. The funding will also enable the state to train staff to assist individuals using the kiosks. They will be located in difficult to reach areas, with a particular focus on Native American and Latino communities, so families can more easily access them and so mixed-status families unwilling to enter a state department location may also gain access.[74] While they will only do Medicaid/CHIP enrollment, the department is setting them up to allow expansion into other programs in the future if funding becomes available.[75]

Facilitated Enrollment, New York: Since 2000, New York State has provided funding to community-based organizations and health plans to find and enroll "hard-to-reach" New Yorkers in public health plans. In recent years, this program has been funded at $15 million per year (half federal, half state). This covers Medicaid, Child Health Plus (CHIP), and Family Health Plus (a Medicaid expansion for low-income adults).   There are more than 100 community-based facilitated enrollment organizations, including multi-service agencies, health and human service providers, immigrant service organizations and local government agencies.[76] Seedco, which conducts multi-benefit screening and application assistance with its EarnBenefits software, is a Facilitated

Enrollment grantee; however, the grant only pays for the time of staff who are only doing health insurance enrollment. In other words, Seedco has not been able to cost-allocate a share of multi-benefit screening to this funding stream.

Eligibility and Targeting

Only the state agency responsible for administering the Medicaid and CHIP programs can receive reimbursement for outreach costs. States may contract with nonprofit organizations or other public entities to provide services.

The 2009 CHIP Reauthorization Act provided separate funding for 100 percent federally funded CHIP outreach and enrollment grants. In FY 2009, $40 million was awarded in outreach grants to community-based organizations, states, community health centers and other health care providers, as well as faith-based organizations, school districts and Tribal organizations.[77] A similar sum remains to be spent and is expected to be awarded in FY 2011.

Medicaid eligibility rules are extremely complicated and vary from state to state. However, Medicaid is generally limited to low-income families with children and individuals with disabilities. Effective in 2014, under the Affordable Care Act, Medicaid will become available to nearly everyone with family income under 138 percent of the federal poverty level.[78] CHIP was created to provide coverage to low-income uninsured children not eligible for Medicaid. Forty-four states set the income limit for children's health insurance coverage under CHIP or Medicaid at 200 percent of the federal poverty level or higher.[79] Pregnant women may also be covered under CHIP.

Federal Funding: Outreach costs under CHIP and Medicaid are not reported separately. Under the separate CHIP outreach grant program, $40 million was awarded in 2009 for outreach grants and will be again in 2011.

Type of Program: Partial reimbursement of state expenditures. Additionally, competitive outreach grants were available in FY 2009 and are expected again in FY 2011.

Agency with Jurisdiction: U.S. Department of Health and Human Services (HHS), Centers for Medicare and Medicaid Services (CMS),

Match Required: Under Medicaid, CMS reimburses states for 50 percent of administrative costs, including outreach expenses. CHIP match rates are higher, and vary by state. CHIP outreach grants do not require a match.

Services/Program Support

Under Medicaid, federal payment is available for the costs of administrative activities "as found necessary by the Secretary for the proper and efficient administration of the state plan." CMS has clarified that this covers outreach activities, including "informing families about Medicaid through brochures or other promotional material; assisting families in completing Medicaid applications; and providing the necessary forms and packaging for Medicaid eligibility determinations."[80]

Federal regulations require states to outline their general outreach strategies in their CHIP state plans. The overarching goal is to inform families of the program and assist them in enrolling if eligible. States use a range of strategies including media campaigns, websites, hotlines, community events, and partnerships with other organizations. States may do broad-based outreach, or may target their activities at certain populations that are less likely to be enrolled.[81]

One of the strategies states can use to reach out to those potentially eligible for Medicaid or CHIP benefits is to partner with nonprofit organizations, which can be reimbursed for outreach activities. States have full discretion over the design of their outreach programs, which can include grants or contracts with nonprofit organizations. A number of states have offered an incentive payment per newly enrolled participant for community-based organizations that do outreach activities.

Non-Federal Funds

Under Medicaid, CMS reimburses states for 50 percent of administrative costs, including outreach expenses. CHIP match rates are higher, and vary by state (see: http://aspe.hhs.gov/health/fmap.htm) However, CHIP administrative spending is limited to 10 percent of each state's total CHIP expenditures on health insurance coverage, and total CHIP funds are capped.

Funds claimed for non-federal match may not originate from other federal programs, and may not have been used as match or maintenance of effort for other funding streams. They do not need to be spent by the state health organization. For example, many states enter into interagency agreements with local school districts to claim as Medicaid administrative costs the time school employees spend conducting outreach and enrollment assistance.[82]

Private foundation grants or other private funds that are not provider-related may also be used as the non-federal share. For example, some states, such as Arkansas, used funds provided by the Robert Wood Johnson Foundation under the Covering Kids initiative as non-federal share. Contributions made by health care providers, such as managed care organizations (MCOs), hospitals, clinics, or physicians, generally are not permitted to draw down federal administrative match, except in limited circumstances.[83]

CHIP outreach grants do not require a match, but states that receive these grants may not reduce their spending on outreach and enrollment activities.

Program Limitations

States have a great deal of flexibility in determining what outreach activities to conduct, but in recent years, many states have been cutting back due to budget concerns. For example, California stopped making payments to organizations providing application assistance for each approved application. States are concerned about the cost of both the outreach activities and the state share of health insurance for new enrollees.

Costs associated with outreach and screening for other income supports may not be claimed under either Medicaid or CHIP. While it is possible to allocate the costs of multi-benefit outreach and screening across programs, most states have not done so. In particular, many states have done CHIP outreach as a stand-alone activity to minimize the "welfare stigma" associated with other benefits.

State Contacts

Medicaid and CHIP are typically operated by state health agencies. A list of state agency websites is available at http://www.nasmd.org/links/state_medicaid_links.asp

Volunteer Income Tax Assistance (VITA) Grants

The Volunteer Income Tax Assistance (VITA) program originated with the Tax Reform Act of 1969 and offers free tax help through community organizations and government entities for low to moderate income individuals who cannot afford professional assistance. The VITA Grant Program was created in 2007 to extend VITA services to hard-to-reach clients in both urban and non-urban areas; increase the capacity of programs to file taxes electronically; heighten quality control; enhance volunteer training; and improve the accuracy of tax returns filed at volunteer sites.[84] The program has a narrow scope, and organizations may find that many of the expenses of running a free tax preparation site are not allowable; however, since funds flow directly to organizations, it may be a good option for providers of integrated services seeking to strengthen their capacity to provide tax preparation services.

Elements of Integrated Service Delivery

Infrastructure		Core 1: Employment and Career Advancement		Core 2: Income Enhancements and Work Supports		Core 3: Financial and Asset Building	
Case Management		Job Training		Tax Preparation	●	Financial Coaching	
Research & Evaluation		Case Management (for employment)		Income Supports		Savings and Asset Building Programs	
Technology	●	Job Retention Support		Supportive Services/ Human Services Referrals			
				Financial Aid			

State and Nonprofit Examples

TAX HELP New Mexico, Albuquerque, New Mexico: TAX HELP New Mexico trains students of accounting and other subjects from New Mexico high schools and Central New Mexico Community College (CNM) to be volunteer tax preparers through an online, credit bearing course. The course is attractive to students because it teaches a real skill and fulfills a high school online learning graduation requirement. The course is also available to non-student volunteers. Those trained through the course volunteer at 48 tax sites throughout the state, including one on the campus of CNM, which also houses the state's only Center for Working Families. Many of the other tax sites have become robust, incorporating financial literacy and work supports information. TAX HELP New Mexico was New Mexico's only recipient of IRS VITA Grants in 2009, 2010 and 2011. The IRS has allocated less funding to the program in recent years, from just under $144,000 in 2009 to $75,000 in 2011.[85] However, the program has been successful in leveraging other funding sources, including funds from the New Mexico Higher Education and Taxation and Revenue Departments, as well as from private foundations.[86]

The Center for Economic Progress, Chicago, Illinois: The Center for Economic Progress (CEP) receives one of the largest VITA Grants in the country, and serves among the greatest number of people in free tax preparation sites throughout the city of Chicago. CEP co-locates with 10 of the 12 Center for Working Families (CWFs) in Chicago during tax season. It also works out of other organizations and community colleges, and runs various one-day tax clinics.[87] The financial coaches at the CWF locations pull credit scores and provide one-on-one coaching for those who come to have their taxes prepared. CWF coaches are also able to help individuals ensure they have the right documentation, and to make them aware of the program's banking partners and opportunities to pursue new, specialized banking products. CEP also houses the National Community Tax Coalition which provides leadership in advocating for increased federal investments in free tax preparation programs.[88]

Eligibility and Targeting

VITA Grants provide funding to nonprofit organizations and government entities in underserved areas that run free tax preparation programs. Populations served include low-income people in urban and non-urban areas, people with disabilities, those who are non-English speaking persons; elderly taxpayers, and Native Americans.[89] For the 2009 tax year, individuals earning less than $49,000 were eligible to receive free tax preparation.[90] Potential demand for free tax preparation services far exceeds the supply; only about 2.5 percent of those who file for the Earned Income Tax Credit have their taxes prepared by volunteer tax preparers.[91]

Community tax preparation services provide eligible filers with the information and resources they need to apply for tax credits and deductions. These services also reduce the transaction costs associated with filing. In FY09, 147 organizations received $7.4 million in VITA grants to support free tax preparation services in underserved communities.[92]

Federal Funding: Funded at $8 million per year for Fiscal Year (FY) 2008 and FY09. In FY10 (for the 2011 tax filing season) the program was funded at $12 million. For the first time in 2011, VITA sites can apply for multi-year funding for up to three years.

Type of Program: Project grants to government and nonprofit entities, with a matching requirement.

Agency with Jurisdiction: U.S. Department of the Treasury, Internal Revenue Service (IRS).

Non-Federal Funds: VITA has a 100 percent matching requirement. This means that, if an organization received a $50,000 grant, it must match that funding with at least $50,000.

The IRS also supports related but separately administered grant programs focusing on the elderly and non-English speaking. Tax Counseling for the Elderly (TCE)[93] provides targeted funding for tax preparation sites that serve individuals aged 60 and older, and the Low-Income Taxpayer Clinic (LITC) provides grant funding to organizations that provide legal representation to low-income taxpayers in federal tax controversies, as well as tax education and outreach for taxpayers who speak English as a second language.[94] All of these programs are small. In 2010, the IRS awarded just over $5 million to TCE grantees and just under $10 million to LITC grantees.[95]

Services/Program Support

VITA Grants are provided by the IRS to:

1. Enable VITA programs to extend services to underserved populations in the hardest-to-reach areas, both urban and non-urban;
2. Increase the capacity to file returns electronically;
3. Heighten quality control;
4. Enhance training of volunteers; and
5. Improve the accuracy rate of returns prepared at VITA sites.

Allowable expenses include technology, such as computers, printers and other related supplies; facilities costs; and the costs of training volunteers and running a VITA site, including publicity, interpreter services and office supplies. Applicants are encouraged to request funding for computers and printers when community resources are not available. Tax software is not an allowable cost as the IRS provides VITA sites with TaxWise software without charge. Support services, such as child care for those receiving tax preparation, and wraparound services including financial literacy are explicitly excluded from the list of allowable expenses.[96]

The program requires organizations to provide a one-to-one match for the funds they receive in the form of cash, computer hardware and software, and third party in-kind contributions, including space, volunteer time, supplies and advertising. Only funds expended in support of the VITA Program qualify as matching funds.

However, all contributions, including cash and third party in-kind contributions, are accepted as part of grantee cost sharing if they meet a set of conditions.[97]

Program Limitations

VITA Grant funding requires a one-to-one match on all funds received. It also has very narrow and specific allowable uses. Providers of integrated services would need to be able to specifically identify costs related to free tax preparation services, rather than the full set of bundled services. Additionally, VITA Grant funding is small compared to the total number of VITA sites.

Grantees and Application Process

A list of 2011 VITA grant recipients is available at:
http://www.irs.gov/pub/newsroom/vita_grant_recipients_2011-110510.pdf.

The most recent Application Package is available at: http://www.irs.gov/pub/irs-pdf/p4671.pdf.

Assets for Independence (AFI) Demonstration Project

Assets for Independence (AFI) Demonstration Project grants provide support to community-based organizations and local governments that administer individual development account (IDA) asset-building programs that help low-income individuals save for college, business investments or the purchase of a first home. IDAs are matched-savings accounts, meaning that every dollar contributed to the account by a participant is matched by a combination of federal AFI grant funds and private matching funds. AFI grants also include funding for basic financial management training and support services for IDA participants.

Elements of Integrated Service Delivery

Infrastructure		Core 1: Employment and Career Advancement		Core 2: Income Enhancements and Work Supports		Core 3: Financial and Asset Building	
Case Management	●	Job Training		Tax Preparation		Financial Coaching	●
Research & Evaluation	●	Case Management (for employment)		Income Supports	●	Savings and Asset Building Programs	●
Technology		Job Retention Support		Supportive Services/ Human Services Referrals	●		
				Financial Aid	●		

State and Nonprofit Examples

Community Action New Mexico (now Prosperity Works): New Mexico's association of Community Action Agencies, Community Action New Mexico, has been the primary AFI grantee in the state for many years. In 2010, the asset building component was spun off into a freestanding organization, Prosperity Works. The organization funnels funds from the state's IDA budget item and the AFI grant to more than 50 smaller nonprofits that connect with individual IDA program participants and administer the program. Prosperity Works focuses on coordinating the coalition, leveraging match funds and providing technical assistance.

United Way of Metropolitan Atlanta, Atlanta, Georgia: The United Way in Atlanta covers a 13-county area and provides financial and technical assistance support for an array of programs that seek to improve the financial stability of residents. Similarly to Prosperity Works, the United Way uses its status as a large intermediary to apply for the AFI grant and to connect with partners in their region to administer IDA programs. One partner IDA program is in the village of Gwinnet, in a "financial service center" supported by the United Way and an array of other community partners including: the Atlanta Prosperity campaign; Gwinnet Technical College; the University of Georgia Small Business Development Center, and the Women's Economic Development Agency (WEDA). By targeting a specific community, organizations that administer IDA programming can provide conveniently located wraparound services and guidance as participants save.

Eligibility and Targeting

Independent nonprofit organizations with 501(c)(3) tax status, including antipoverty groups and faith-based organizations, state and local government entities; regional organizations and partnerships, independent school districts, low-income credit unions that partner with community based organizations, and housing authorities are all eligible to apply for AFI project grants. The grant period for AFI programs is 5 years (60 months).[98] 55

to 65 organizations receive AFI funding per year. The average grant size is $350,000, with an award ceiling of $1 million.[99]

IDA program participants must be low-income and fit into at least one of three categories:

- Eligible for Temporary Assistance for Needy Families (TANF);

- Eligible for the Federal Earned Income Tax Credit (EITC); or

- Have income is less than two times the Federal poverty line[100] (approximately $44,000 for a family of four in 2009).[101]
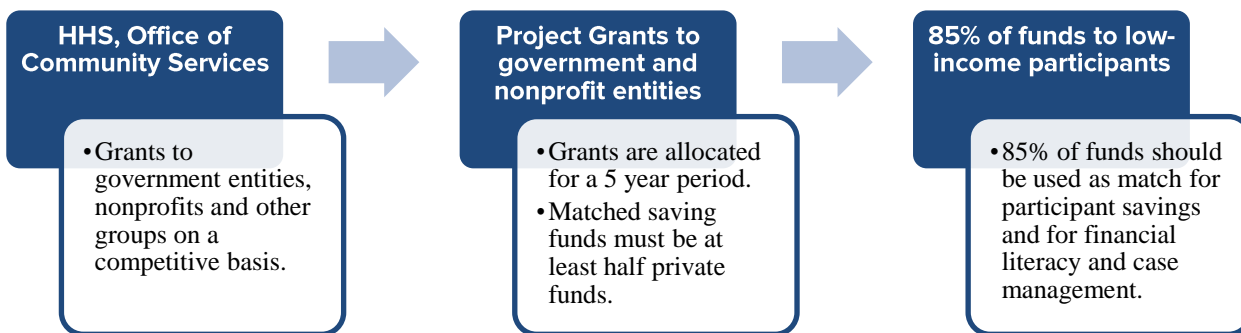
The program also contains an asset ceiling requirement. During the calendar year preceding the eligibility determination, participants must not have a net worth that exceeds $10,000, excluding their primary dwelling unit and one motor vehicle owned by a member of the household.[102]

Federal Funding: Approximately $24 million a year in FY 07, FY08 and FY09; and $19 million in FY10. Grants are awarded for a project period of 5 years.

Type of Program: Competitive grants to nonprofit organizations and government entities.

Agency with Jurisdiction: U.S. Department of Health and Human Services, Administration for Children and Families.

Match Required: 100 percent matching requirement for all AFI funds. No MOE (Maintenance of Effort) requirements.

HHS, Office of Community Services		Project Grants to government and nonprofit entities		85% of funds to low-income participants
• Grants to government entities, nonprofits and other groups on a competitive basis.	→	• Grants are allocated for a 5 year period. • Matched saving funds must be at least half private funds.	→	• 85% of funds should be used as match for participant savings and for financial literacy and case management.

Services/Program Support

The Assets for Independence Demonstration Project funds IDAs and financial education, focused on money management. At least 85 percent of grant funds must be used to:

1. Match participant contributions to individual development accounts.

2. Assist participants in obtaining economic literacy skills. They should learn about: managing bank account and credit cards; credit counseling and repair; and receive guidance in receiving refundable tax credits including the Child Tax Credit and Earned Income Tax Credit. This should also include individual case management, financial management training and support services.

3. Assist participants to achieve self-sufficiency through higher education, home or business ownership (for which they will use qualified funds).

The remaining 15 percent is for data collection and evaluation (at least 2 percent),[103] the costs of administration (7.5 percent),[104] and non-administrative functions related to helping participants obtain the skills and information necessary to achieve economic self-sufficiency (5.5 percent). This includes case management, budgeting, economic literacy and credit counseling.

Participant contributions to IDAs are matched at a rate of at least one dollar for every participant dollar saved. Most programs have a match of two dollars for every dollar saved, but match rates vary from 1:1 to 1:8.[105] The federal portion of the match is limited to $2,000 for an individual and $4,000 per household (where multiple members hold IDAs). Participants who do not meet their goals do not receive matching funds. Programs are able to reallocate. Grantees can re-use the IDA match funds from unsuccessful participants on new participants. Though the total grant period is five years, all of the funds in the IDA must be expended in five years time, so individual participants should plan to save for four of the five years so they can spend at least six months preparing to purchase an asset after they have completed their savings.

Non-Federal Funds

There is a 100 percent nonfederal funding match requirement. Funds may come from public and private sources. Match funds typically come from financial institutions, community or corporate foundations, other private sources, or state or local governments. The only federal funding source that can qualify as a nonfederal contribution is the Community Development Block Grant (CDBG). In order to access these funds, however, AFI projects must negotiate with either their state or local government agency that administers these funds. Applicants must prove that they have nonfederal funds committed by submitting Nonfederal Share Agreements or letters of commitment.[106]

Non-federal match funds must be equal to or greater than the total federal grant allocation, and must be held together with federal funds in the project's Reserve Account. Funds supporting IDA matches must make up 85 percent of the combination of the federal and nonprofit program funds.

Program Limitations

The purpose of the AFI demonstration project is to determine whether IDA programs effectively provide assets-based supports that help low-income individuals achieve self-sufficiency. Funds are allocated through a competitive process that provides supports to just over 200 agencies at any given time.

Most of the funding is funneled directly to participants in the form of matched contributions to individual development accounts. Funds can be used for case management, as well as for financial literacy counseling and the asset-building program. Only 15 percent of program funds can be used for administration, facilities and support. Along with the one-to-one matching requirement, this small amount of money for program administration makes the project difficult to sustain without significant outside funding.

Grantees and Application Process

For a list of current grantees, see the AFI project locator, at:
http://www.acf.hhs.gov/programs/ocs/afi/states.html.

Grant announcements are issued periodically, with applications accepted on a rolling basis. Applications are not currently being accepted until a new announcement is published for Fiscal Year 2011.[107]

Resident Opportunity and Self-Sufficiency (ROSS)

The Resident Opportunity and Self-Sufficiency (ROSS)[108] program helps families that live in public housing decrease their reliance on income and work supports. ROSS grants pay the salaries of ROSS service coordinators who are case managers and perform general needs assessments of residents in public housing and Indian housing communities. They identify service providers to meet residents' needs, including: transportation, child care, education, training, and work supports. ROSS can support the case management portion of integrated service delivery aimed at public housing residents; including work supports screening and assistance.[109]

Elements of Integrated Service Delivery						
Infrastructure		**Core 1: Employment and Career Advancement**		**Core 2: Income Enhancements and Work Supports**		**Core 3: Financial and Asset Building**
Case Management	●	Job Training		Tax Preparation		Financial Coaching
Research & Evaluation		Case Management (for employment)	●	Income Supports	●	Savings and Asset Building Programs
Technology		Job Retention Support		Supportive Services/ Human Services Referrals		
				Financial Aid		

State and Nonprofit Examples

Center for New Horizons (CNH), Chicago, Illinois: Centers for New Horizons (CNH), a non-profit in Chicago supported by the Chicago Housing Authority (CHA), received a grant from ROSS that funds one service coordinator position. Because CHA offers a separate program called FamilyWorks that provides ongoing case management to public housing residents, the CNH service coordinator focuses on identifying the needs of public housing residents based on initial consultations, and linking residents to surrounding community organizations and companies that can help meet their needs.

Da-Network Housing Ministries, Inc., Philadelphia, Pennsylvania: Da-Network Housing Ministries, a nonprofit social services organization in North Philadelphia, uses ROSS to fund the salaries of two services coordinators who work with the residents of five Philadelphia public housing sites. The organization received the grant directly from HUD, but works with local tenant councils to gain better access to residents. Each service coordinator serves a minimum of 75 clients per year. They carry out intake assessments, and assist residents in connecting to workforce training, computer literacy, financial literacy and work supports. The coordinators also connect clients to other services provided by Da-Network and bring in other organizations to facilitate workshops for residents.

Eligibility and Targeting[110]

ROSS grants can go to Public Housing Agencies (PHAs), Resident Associations (RAs), tribally-designated housing entities,

Federal Funding: In FY10, $50 million was allocated, some of which is reserved for the PH FSS program. Of the total FY09 allocation of $37.5 to ROSS, $28 million was available for ROSS service coordinators.
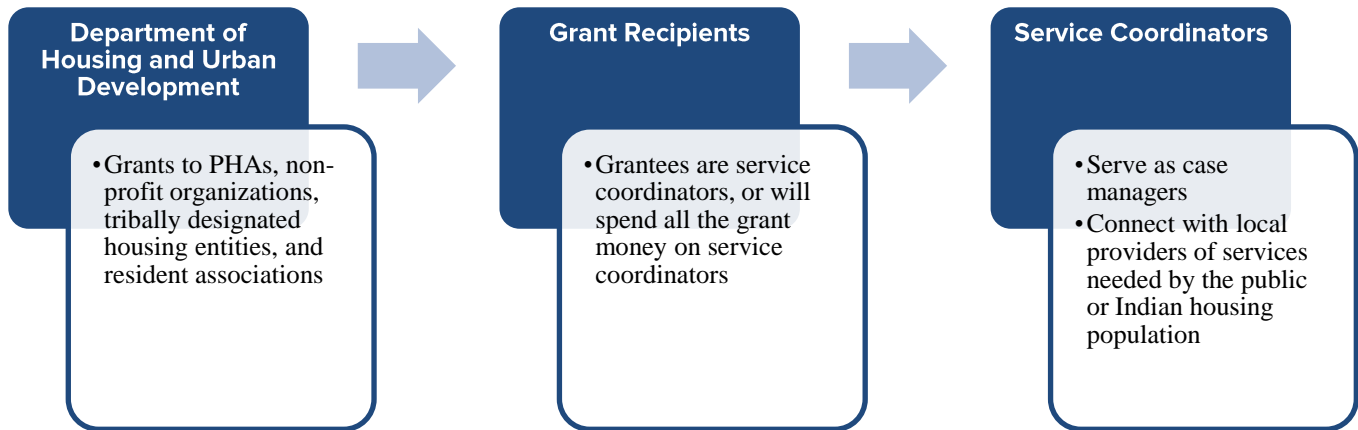
Type of Program: Discretionary Grants

Agency with Jurisdiction: U.S. Department of Housing and Urban Development.

Match Required: 25 percent local match required, with in-kind services countable.

and non-profit organizations. Only residents of public and Indian housing are eligible to receive case management services from ROSS service coordinators, and each coordinator must be assigned full-time to a particular housing project. To be eligible to serve this group, a non-profit organization must receive a letter of support from the local PHA or RA.[111]

There have been some proposals to combine ROSS funds with the Public Housing General Funds, and eliminate ROSS as a stand-alone program.[112] While supportive services and case management are allowable activities under the Public Housing General Fund, most PHAs use their limited General Funds for facilities improvements and maintenance.[113]

Department of Housing and Urban Development		Grant Recipients		Service Coordinators
•Grants to PHAs, non-profit organizations, tribally designated housing entities, and resident associations	→	•Grantees are service coordinators, or will spend all the grant money on service coordinators	→	•Serve as case managers •Connect with local providers of services needed by the public or Indian housing population

Services/Program Support

The purpose of the ROSS program is: "To promote the development of local strategies to coordinate the use of assistance under the Public Housing program with public and private resources for supportive services and resident empowerment activities. These services should enable participating families to increase earned income, reduce or eliminate the need for welfare assistance, make progress toward achieving economic independence and housing self-sufficiency or, in the case of elderly or disabled residents, help improve living conditions and enable residents to age-in-place."[114]

ROSS service coordinators function as case-managers and provide a full range of case management services to eligible populations. ROSS service coordinators also coordinate with other programs and agencies to ensure that participants receive necessary services, though ROSS cannot fund service provision directly.

In the most recent ROSS Notice of Funding Available (with applications due February 21, 2011), each ROSS service coordinator grant is a three-year grant that provided funding for the salaries and benefits of up to three service coordinators. The maximum salary per coordinator is $68,000. Grantees are to be allocated $10,000 to pay program administration fees and $2,000 for training and travel.[115] For the remainder of the three- year period, the 91 ROSS grant recipients will receive funding annually. In May of 2010, grantees received a total of $27.9 million.

If supported by RA(s), a non-profit was eligible to apply for one service coordinator position for each RA that supported its application. RAs or non-profits applying on their behalf are by statute entitled to 25 percent of all ROSS service coordinator funds.

If supported by a PHA, a non-profit could apply for positions dependent on the number of units served by the PHA:

- 50 to 1,000 units received 1 service coordinator;
- 1,001 units to 2,500 units received 2 service coordinators;

- 2501+ received 3 service coordinators.[116]

Each non-profit could submit up to three applications requesting up to three service coordinators, meaning that each non-profit could potentially to receive funding for up to nine service coordinator positions. Fiscal year 2009 grantees were determined by lottery from among qualified applications. Slightly less than half of all qualified applicants were funded in fiscal year 2009.[117] For detailed information about the fiscal year 2009 grant application process and requirements, see the fiscal year 2009 ROSS Notice of Funding Available.

Non-Federal Funds

Except for funds used to support the Public Housing Family Self-Sufficiency program, ROSS service coordinator grants require a 25 percent cash or in-kind match.[118] The matching requirement can be satisfied through the provision of services to program participants, by applicants or partnering organizations.[119] Other federal funding sources can provide the match, as long as this is an allowable use of those other federal funds.[120] Thus, federal, state, or foundation funds could provide the match.

Program Limitations

While at one time ROSS funds could be spent directly on services for participants, in fiscal year 2008 the Department of Housing and Urban Development (HUD) limited the allowable uses of ROSS funds exclusively to service coordinators.[121] Since ROSS cannot fund direct service delivery, ROSS service coordinators are responsible for arranging the provision of all services using other funding sources.

Nonprofits are only eligible for a portion of the funds available in ROSS. The remainder is used for the Public Housing Family Self-Sufficiency program.

Grantees

Local funding information for ROSS can be found at: http://portal.hud.gov/portal/page/portal/HUD/documents/PR%20Report%20(1).pdf.

Family Self Sufficiency (FSS) Program

The FSS program is a work incentive and asset building opportunity for those who receive subsidized housing. Under standard HUD rules, families who receive housing subsidies must pay 30 percent of their income toward rent, with the voucher covering the difference between this amount and their total rent bill. The size of each housing voucher is reduced as the income of a family increases, creating what some believe is a large disincentive to work.

The FSS program provides the opportunity for individuals to save the amount their voucher is reduced when their earned income increases and their rent increases. The public housing authority sets up an escrow account and deposits a portion of the HUD housing subsidy into it. This counteracts the disincentive to work, and creates an effective savings tool for low-income families.

A portion of ROSS funds are reserved to provide service coordination for participants in FSS programs. However, there are more FSS programs than funding for service coordination.

For technical assistance, contact the ROSS Program manager at 202-402-2341. Answers to frequently asked questions are available at: http://www.hud.gov/offices/adm/grants/fundsavail.cfm.

1 Josh Bone, "TANF Education and Training: Kentucky's Ready to Work," Center for Law and Social Policy, January 2010, http://www.clasp.org/admin/site/publications/files/RTW.pdf.

2 Josh Bone, "TANF Education and Training: The Arkansas Career Pathways Initiative," Center for Law and Social Policy, April 2010, http://www.clasp.org/admin/site/publications/files/Arkansas-Career-Pathways.pdf.

3 In addition to Aid to Families with Dependent Children (AFDC), the predecessor programs include the Job Opportunities and Basic Skills Training (JOBS) program and Emergency Assistance (EA). With the exception of activities authorized under the healthy marriage and responsible fatherhood grants, all activities supported with MOE funds must benefit members of "needy families." If programs are counted that existed prior to 1996 but were not funded out of AFDC, JOBS or EA, only the increase in spending counts. MOE funds are not subject to some of the restrictions that apply to the TANF funds, such as the 5-year lifetime limit on assistance and the ban on medical services.

4 "Community Services Block Grant Fact Sheet," U.S. Department of Health and Human Services, Administration for Children & Families, Office of Community Services, July 15, 2010, http://www.acf.hhs.gov/programs/ocs/csbg/aboutus/factsheets.htm.

5 "Programs & Services: Manage your Future", Community Action Agency of New Haven, 2010, http://www.caanh.net/programs_and_services/manage_your_future/; and personal correspondence with Amos Smith, CAANH Executive Director, December 20, 2010.

6 "Demonstration: SETI Local Partners," CFED, http://cfed.org/programs/seti/demonstration/local_partner/index.html.

7 States could serve individuals up to 200 percent of the Federal Poverty Guideline with CSBG Recovery Act funds and regular CSBG funds for FY2009 and FY2010.

8 "About CAAs," Community Action Partnership, http://www.communityactionpartnership.com/index.php?option=com_content&task=view&id=21&Itemid=50. In some cases funds may be allocated to tribal organizations, farm worker organizations, or Limited Purpose Agencies (LPA), which commonly provide a limited number of programs or serve a single demographic.

9 States may not terminate or reduce the funding of an eligible entity below the proportional share of funding an 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 termination or reduction. Funding reduction causes include a statewide redistribution of funds due to new census or other appropriate data, the designation of a new entity, or failure of an eligible entity to comply with state agreement, state plan or other state requirement. Termination causes generally relate to failure of an eligible entity to meet performance objectives, standards, and/or goals. When an eligible entity is terminated the state may choose to serve the geographic area and designate an eligible entity to serve the area according to the requirements of the CSBG Act and CSBG State Plan.

10 PUBLIC LAW 105–285—OCT. 27, 1998. Title II, Community Services Block Grant Program. http://www.acf.hhs.gov/programs/ocs/csbg/pdf/csbg_law_508.pdf.

11 "Community Services Block Grant Annual Report 2008," NASCSP, the National Association for State Community Services Program (NASCSP).

12 "Title XX Social Services," Illinois Department of Human Services, http://www.dhs.state.il.us/page.aspx?item=30364.

13 For more information about Mujer Avanzando, visit: http://www.idpl.org/idpl_mujer_avanzando.html.

14 States spent $1.18 billion in SSBG from TANF transfers in FY 2007 and $1.12 billion in FY 2008. "Social Services Block Grant Program Annual Report 2008," U.S. Department of Health and Human Services, Administration of Children and Families, http://www.acf.hhs.gov/programs/ocs/ssbg/reports/2008/index.html.

15 Ibid.

16 "Community Development Block Grant, Entitlement Communities Grants," U.S. Department of Housing & Urban Development, August 27, 2009, http://www.hud.gov/offices/cpd/communitydevelopment/programs/entitlement/.

17 "2010 Action Plan," City of Indianapolis, Division of Community Economic Development, November 17, 2009. http://indygov.org/eGov/City/DMD/Community/Documents/2010%20Final.pdf.

18 "What is a Great Indy Neighborhood?" Great Indy Neighborhoods, http://www.greatindyneighborhoods.org/about/index.html.

19 "Five Year Strategic Plan, 2005-2010," Cities of Portland and Gresham Multnomah County, Oregon, Section 3. http://www.portlandonline.com/phb/index.cfm?c=52523&a=293817 and "Changing Lives: Innovative Solutions to Poverty in Portland, Oregon." Northwest Area Foundation, Updated Version 2007, http://www.pdc.us/pdf/bus_serv/economic-opp/Changing-Lives-Brochure.pdf.

20 "Economic Opportunity Grantees 2009-2010," Portland Development Commission, http://www.pdc.us/pdf/bus_serv/economic-opp/Portfolio-Current-Projects.pdf.

21 "NC Local Program Partnerships," IDA & Asset Building Collaborative of North Carolina, http://www.ncidacollaborative.org/funders.htm.

22 Section 5305 of Public Law 93-383, "Allocation and Distribution of Funds." http://www.hud.gov/offices/cpd/communitydevelopment/rulesandregs/laws/sec5306.cfm.

23 Code of Federal Regulations, Title 24, Part 91, Subpart A. Consolidated Submissions for Community Development Block Grant Program.

24 24 CFR 570.203. http://cfr.vlex.com/vid/570-203-special-economic-development-19928653

25 There are various carve outs for communities including Los Angeles and Miami that used more than 15 percent of funds for public services in either Fiscal Year 1982 or 1983. These communities are allowed to continue using the same percentage of funds as they did during those years. As with other regulations, this one is subject to enforcement by regional HUD officials, who vary in their stringency.

26 Code of Federal Regulations, Title 24, housing and Urban Development. Part 570 – Community Development Block Grants, Subpart C – Eligible Entities. (§ 570.201)

27 "Chapter 2: Categories of Eligible Activities," Community Development Block Grants Program, U.S. Department of Housing & Urban Development, http://www.hud.gov/offices/cpd/communitydevelopment/library/ch2tabl.pdf.

28 §570.205, as quoted in "Chapter 2: Categories of Eligible Activities," Community Development Block Grants Program, U.S. Department of Housing & Urban Development, Page 2-56, http://www.hud.gov/offices/cpd/communitydevelopment/library/ch2tabl.pdf.

29 "Section 5305: Activities Eligible for Assistance,"Part A, Section 8, http://www.hud.gov/offices/cpd/communitydevelopment/rulesandregs/laws/sec5305.cfm.

30 §570.205 and §570.206, as quoted in "Chapter 2: Categories of Eligible Activities." Community Development Block Grants Program." *U.S. Department of Housing & Urban Development*. Page 2-56. http://www.hud.gov/offices/cpd/communitydevelopment/library/ch2tabl.pdf.

[31] Gwen Rubenstein and Andrea Mayo, *Training Policy In Brief: An Overview of Federal Workforce Development Policies,* The Workforce Alliance, 2006, http://www.greenforall.org/resources/training-policy-in-brief-an-overview-of-federal.

[32] "The Job Center Today," The Job Center, http://www.thejobcenter.org/about-us/job-center-today.html.

[33] Nisha Patel, Lisa Ranghelli and Mark Greenberg. "CLASP Policy Brief 4: A means to an end: Integration of Welfare and Workforce Development Systems," Center for Law and Social Policy, October 2003, http://www.clasp.org/admin/site/publications/files/0155.pdf.

[34] Interview with Tom Dubois, Instituto del Progreso Latino, July 7, 2010. For more information about Instituto's programs, see its website: http://www.idpl.org/idpl_workforce_dev.html.

[35] The relative number of unemployed individuals in areas of substantial unemployment in the State; the number of unemployed individuals (above 4.5 percent) in each state; and the relative number of disadvantaged adults in each state.

[36] Notice of Incentive Funding Availability Based on Program Year (PY) 2008 Performance, Workforce Investment Act of 1998 (WIA). Federal Register: May 7, 2010 (Volume 75, Number 88). http://edocket.access.gpo.gov/2010/2010-10930.htm

[37] Ibid.

[38] "Summary of Workforce Development Provisions of the Workforce Investment Act of 1998," U.S. Department of Labor, Education and Training Administration, January 07, 2010, http://www.doleta.gov/usworkforce/wia/summarywia.cfm.

[39] For more information, consult CLASP's "Building a Comprehensive Youth Employment Delivery System": http://www.clasp.org/admin/site/publications/files/Youth-Employment-Systems.pdf.

[40] The Recovery Act provided an additional WIA youth program funding allocation to states. Funds were used for the same purposes as the annual program allocations, though the upper bound of the age range of eligible participants increased from 21 to 24.

[41] United States Department of Labor, Workforce Investment Act; Lower Living Standard Income Level, Published at 75 Federal Register 25296 on May 7, 2010, http://edocket.access.gpo.gov/2010/pdf/2010-10794.pdf

[42] Workforce Investment Act of 1998 (Public Law 105-220), SEC. 145, RECRUITMENT, SCREENING, SELECTION, AND ASSIGNMENT OF ENROLLEES, http://www.doleta.gov/usworkforce/wia/wialaw.htm#sec503

[43] Caseload data accessed at: http://www.fns.usda.gov/pd/34SNAPmonthly.htm. Share participating in E&T from *Characteristics of Supplemental Nutrition Assistance Program Households: Fiscal Year 2009*, Food Stamp Report No. SNAP-10-CHAR, October 2010.

[44] See: http://www.cga.ct.gov/coc/snap-et_communities.htm

[45] Available at: http://www.fns.usda.gov/snap/rules/Memo/2010/031810.pdf

[46] "TRIO Student Support Services: Purpose," U.S. Department of Education, Office of Postsecondary Education, November, 03, 2009, http://www2.ed.gov/programs/triostudsupp/index.html.

[47] The Higher Education Opportunity Act (Public Law 110-315). http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=110_cong_public_laws&docid=f:publ315.110. Page 122 STAT. 3201.

[48] "2010-2011 Catalog & Student Handbook: Changing Lives, One Student at a Time," Southeast Arkansas Community College, Page 73, https://www.seark.edu/student/2010-2011%20Catalog%20Student.pdf.

[49] "Potentially first-generation college status" refers to individuals in families where neither natural or adoptive partners received a baccalaureate degree, or a student who, prior to the age of 18, regularly resided with and received support from only one natural or adoptive parent and whose parent did not receive a baccalaureate degree. "Low income" students are defined as those whose family's taxable income for the preceding year did not exceed 150 percent of the federal poverty level. Higher Education Act of 1965, 1998 Higher Education Act Amendments, Subpart 2 – Federal Early Outreach and Student Services Programs. Chapter 1 – Federal TRIO programs. Sec. 402A (20 U.S.C. 1070a-11). http://www2.ed.gov/about/offices/list/ope/trio/triohea.pdf

[50] "TRIO Student Support Services: Eligibility," U.S. Department of Education, Office of Postsecondary Education, November, 03, 2009, http://www2.ed.gov/programs/triostudsupp/eligibility.html.

[51] "TRIO Student Support Services: Purpose," http://www2.ed.gov/programs/triostudsupp/index.html.

[52] "Eligibility," http://www2.ed.gov/programs/triostudsupp/eligibility.html.

[53] Federal Register Announcement: FR Doc E9-25389[Federal Register: October 22, 2009 (Volume 74, Number 203)] [Notices] http://www2.ed.gov/legislation/FedRegister/announcements/2009-4/102209b.html; the Higher Education Opportunity Act, Title III, Part A and Part B, and Title V.

[54] "A Report on the EOC Program: 2007-08, With Select Comparative Data, 2002-07," U.S. Department of Education, October 19, 2010, http://www2.ed.gov/programs/trioeoc/eocpublication07-08.pdf.

[55] Connecticut Talent Assistance Corporation (CONNTAC), http://conntacinc.org/index.htm

[56] "Educational Opportunity Center (EOC)," Malcolm X City College of Chicago, http://malcolmx.ccc.edu/Academic_Programs/TRIO_Educational_Opportunity_Center.asp; and interview with Roy Saldana, EOC Director, November 16, 2010.

[57] "Educational Opportunity Centers Program, TRIO: Eligibility," U.S. Department of Education, Office of Postsecondary Education, September 29, 2009, http://www2.ed.gov/programs/trioeoc/eligibility.html.

[58] "Potentially first-generation college status" refers to individuals in families where neither natural or adoptive partners received a baccalaureate degree, or a student who, prior to the age of 18, regularly resided with and received support from only one natural or adoptive parent and whose parent did not receive a baccalaureate degree. Higher Education Act of 1965, 1998 Higher Education Act Amendments, Subpart 2 – Federal Early Outreach and Student Services Programs. Chapter 1 – Federal TRIO programs. Sec. 402A (20 U.S.C. 1070a-11). http://www2.ed.gov/about/offices/list/ope/trio/triohea.pdf

[6] "Educational Opportunity Centers Program," U.S. Department of Education, Office of Postsecondary Education, October 19, 2010, http://www2.ed.gov/programs/trioeoc/index.html.

[60] The HEOA made improving financial and economic literacy one of the goals of the Program. The final rule, Doc ID: fr26oc10-11, is available at http://edocket.access.gpo.gov/2010/2010-24324.htm.

[61] Specifically, these groups can receive up to 15 (out of 100) "prior experience points" in their application's scoring for funding. These are not automatic points, but are provided for outcome criteria such as enrollment rates. Code of Federal Regulations, Title 34, Volume 3. Chapter VI, Office of Postsecondary Education, Department of Education. Revised as of July 1, 2008, Page 319, http://edocket.access.gpo.gov/cfr_2008/julqtr/34cfr644.20.htm.

[62] It is possible a competition could take place between five year periods if TRIO or the EOC program received a large funding increase. Even in this case, however, it is likely the Office of Postsecondary Education would choose from previous applicants rather than launch a new competition.

[63] "College Access Challenge Grant Program," U.S. Department of Education, July 09, 2010, http://www2.ed.gov/programs/cacg/index.html.

[64] "College Access Challenge Grant Program," Catalogue of Domestic Federal Assistance Programs, https://www.cfda.gov/?s=program&mode=form&tab=step1&id=b058362dd6d8d72c6651ba8749cc1bc6; and The Higher Education Opportunity Act (Public Law 110-315) (HEOA), "Title VIII – Partnership Grants, Section 801. College Access Challenge Grant Program," http://www2.ed.gov/programs/cacg/legislation.html.

[65] The Higher Education Opportunity Act (Public Law 110-315) (HEOA), "Title VIII – Partnership Grants, Section 801, College Access Challenge Grant Program," http://www2.ed.gov/programs/cacg/legislation.html; and "Archived FY2008 College Access Challenge Grant Program Application Package," http://www2.ed.gov/programs/cacg/applicant.html.

[66] Specifically, states must expend amounts that are equal to or greater than: (1) the average amount provided for non-capital and non-direct research and development expenses or costs by the state to the public institutions during the five most recent academic years for which satisfactory data are available; and (2) the average amount provided for student financial aid for paying postsecondary education costs by the state to private institutions during the most recent academic years for which satisfactory data are available." College Access Challenge Grant Program Application Package for FY2010, Page 6, http://www2.ed.gov/programs/cacg/applicant.html. For more information on the history and purpose of this requirement, see Alexander, King F. et al, "Maintenance of Effort: An Evolving Federal-State Policy Approach to Ensuring College Affordability," American Association of State Colleges and Universities, A Higher Education Policy Brief, April 2010. http://www.congressweb.com/aascu/docfiles/AASCU_Maintenance%20_of_Effort_College_Affordability_April_2010.pdf

[67] "College Access Challenge Grant Program Application Package for FY2010," U.S. Department of Education, Page 6, August 06, 2010, http://www2.ed.gov/programs/cacg/applicant.html.

[68] "Supplemental Nutrition Assistance Program, Fiscal Year 2009 – Outreach Grants. Summary of Funded Projects," U.S. Department of Agriculture, Food and Nutrition Service, June 25, 2009, http://www.fns.usda.gov/snap/outreach/grants/2009/2009-summary.htm.

[69] "Frequently Asked Questions, Supplemental Nutrition Assistance Program," U.S. Department of Agriculture, Food and Nutrition Service, November 02, 2010, http://www.fns.usda.gov/snap/faqs.htm.

[70] "Leveraging Partnerships to Fund SNAP Outreach." U.S. Department of Agriculture, Food and Nutrition Service, Office of Strategic Initiatives, Partnerships and Outreach, April 19, 2010, http://www.fns.usda.gov/fns/outreach/documents/federal-funding.pdf.

[71] "Supplemental Nutrition Assistance Program (SNAP) State Outreach Plan Guidance," U.S. Department of Agriculture, Food and Nutrition Service, May 26, 2009, http://www.fns.usda.gov/SNAP/outreach/guidance/Outreach_Plan_Guidance.pdf.

[72] Ibid.

[73] "Frequently Asked Questions, Supplemental Nutrition Assistance Program," U.S. Department of Agriculture, Food and Nutrition Service, November 02, 2010, http://www.fns.usda.gov/snap/faqs.htm.

[74] "New Mexico: Outreach Grant Funding for "Enrollment Kiosks," The Commonwealth Fund, May 19, 2010, http://www.commonwealthfund.org/Content/Innovations/State-Profiles/2010/May/New-Mexico-Outreach.aspx.

[75] Email communication with Kathy Slater-Huff, Marketing & Outreach Manager, HSD/Medical Assistance Division, June 25, 2010.

[76] Kate Lawler and Anne Marie Costello, "Community-based Facilitated Enrollment::Meeting Uninsured New Yorkers Where They Are," The Children's Aid Society and Children's Defense Fund, 2005, http://www.nyshealthfoundation.org/userfiles/file/Facilitated%20Enrollment%20NY.pdf.

[77] A total of $100 million was provided for outreach between FY 2009 and 2013. Of this, $10 million was used for a national outreach campaign, $10 million was reserved for Indian tribes, $40 million was awarded in FY 2009 and the remainder was retained for later grants. For information on the outreach grants, see: http://www.cms.gov/CHIPRA/11_outreachenrollmentgrants.asp.

[78] See https://www.cms.gov/MedicaidEligibility/01_Overview.asp for more information on Medicaid eligibility rules.

[79] "Children's Health Insurance Program Reauthorization of 2009," Kaiser Commission on Medicaid and the Uninsured, 2009. http://www.kff.org/medicaid/upload/7863.pdf.

[80] January 23, 1998 Letter to State Health Officials, Centers for Medicare and Medicaid Services. Available at https://www.cms.gov/smdl/downloads/sho012398.pdf.

[81] 2007 SCHIP Annual Reports, A Review, CMS, available at: http://www.cms.gov/NationalCHIPPolicy/downloads/Final2007CHIPAnnualReport.pdf.

[82] For guidance on the cost allocation rules for such claims, see "Medicaid School-Based Administrative Claiming Guide" Centers for Medicare and Medicaid Services, May 2003. In 2007, CMS proposed to eliminate federal Medicaid payment for school-based administrative activities, but Congress prevented the rule from taking effect and in 2009, CMS rescinded the rule.

[83] Donna Cohen Ross, "Sources of Federal Funding for Children's Health Insurance Outreach," Center on Budget and Policy Priorities, February 17, 2000, http://www.cbpp.org/cms/?fa=view&id=1072.

[84] "IRS VITA Grant Program," U.S. Department of Treasury, Internal Revenue Service, November 10, 2010, http://www.irs.gov/individuals/article/0,,id=184243,00.html.

[85] "TAX HELP New Mexico," http://www.newmexicoresources.org/pages.cfm?contentID=66&pageID=12&Subpages=yes, "2010 VITA Grant Recipients," U.S. Department of Treasury, Internal Revenue Service, http://www.irs.gov/pub/irs-utl/2010_vita_grants.pdf, and "2011 VITA Grant Recipients," U.S. Department of Treasury, Internal Revenue Service, http://www.irs.gov/pub/newsroom/vita_grant_recipients_2011-110510.pdf.

[86] "TAX HELP New Mexico," Central New Mexico Community College, http://www.cnm.edu/taxhelp/index.php

[87] "Get your Taxes Done for Free," Center for Economic Progress, http://www.economicprogress.org/index.php/c/Services.

[88] Ed Finkel, "Tax Refunds Soon to Flow through the City," Local Initiative Support Corporation, February 1, 2008, http://www.lisc-chicago.org/display.aspx?pointer=5136.

[89] "Volunteer income Tax Assistance Grant Program Overview and Application Package," U.S. Department of Treasury, Internal Revenue Service, 2010, http://www.irs.gov/pub/irs-pdf/p4671.pdf.

[90] "Ten Facts about IRS Volunteer Tax Assistance," U.S. Department of Treasury, Internal Revenue Service, http://www.irs.gov/newsroom/article/0,,id=108104,00.html.

[91] 2007 Census Data from the Brookings Institution, Metropolitan Policy Program, "EITC Interactive Data,"

[92] "VITA Funding Talking Points," National Community Tax Coalition, http://www.tax-coalition.org/policy-resources/vita-funding/Talking%20Points%20FY2011.pdf/view

[93] "Tax Counseling for the Elderly," U.S. Department of Treasury, Internal Revenue Service, http://www.irs.gov/individuals/article/0%2C%2Cid=109754%2C00.html

[94] "Low-Income Taxpayer Clinic, Grant Recipients Announced," U.S. Department of Treasury, Internal Revenue Service, http://www.irs.gov/newsroom/article/0,,id=221524,00.html; and "Low-Income Taxpayer Clinics," http://www.irs.gov/advocate/article/0,,id=106991,00.html

[95] For more information and a list of TCE grantees, visit: http://www.irs.gov/individuals/article/0%2C%2Cid=109754%2C00.html. And, for more information on LITC, visit: http://www.irs.gov/advocate/article/0,,id=106991,00.html.

[96] "Appendix B, Exhibit 1: Allowable/Unallowable Expenses." Volunteer income Tax Assistance Grant Program Overview and Application Package, 2010. Page 59. http://www.irs.gov/pub/irs-pdf/p4671.pdf.

[97] They must follow the Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals, and other Non-Profit Organizations (2 CFR 215). These matching funds and in-kind contributions must be verified by the grantee's records; not included as contributions or a match from other federally-assisted projects or programs; necessary for "proper and efficient accomplishments of program objectives;" allowable costs; not paid for by the federal government under another award except where authorized by Federal statute; provided for in the approved budget; and conforming to other provisions of the Law. Volunteer Income Tax Assistance Grant Program Overview and Application Package, 2010. Page 8. http://www.irs.gov/pub/irs-pdf/p4671.pdf.

[98] "Fact Sheet: Assets for Independence Demonstration Project," U.S. Department of Health & Human Services, Administration of Children & Families, http://www.acf.hhs.gov/programs/ocs/afi/fact_sheet.html.

[99] "Official Funding Announcement, Assets for Independence Demonstration Program: HHS-2008-ACF-OCS-EI-0053," U.S. Department of Health and Human Services, Administration of Children & Families, http://www.acf.hhs.gov/grants/open/HHS-2008-ACF-OCS-EI-0053.html.

[100] "About Assets for Independence," U.S. Department of Health & Human Services, Department of Community Services, http://www.acf.hhs.gov/programs/ocs/afi/assets.html.

[101] The 2009 HHS Poverty Guidelines: "The 2009 Poverty Guidelines for the 48 Contiguous States and the District of Columbia," U.S. Department of Health and Human Services, August 03, 2010, http://aspe.hhs.gov/poverty/09poverty.shtml.

[102] Public Law 105-285. Title IV Assets for Independence Act, 42 USC 604 note. Section 408. http://www.acf.hhs.gov/programs/ocs/afi/afialaw2000.html.

[103] Assets for Independence Demonstration Program. CFDA Entry. https://www.cfda.gov/?s=program&mode=form&tab=step1&id=a8d1595335d6a9f27e6e614c9490d7da

[104] Public Law 105-285. Title IV Assets for Independence Act, 42 USC 604 note. Section 407(B)(3). http://www.acf.hhs.gov/programs/ocs/afi/afialaw2000.html

[105] "AFI Project Builder: Guide for Planning an AFI Project," U.S. Department of Health and Human Services, Office of Community Services. http://www.acf.hhs.gov/programs/ocs/afi/projectbuilder/pb_chap3d.htm.

[106] Ibid.

[107] The last announcement can be found at: http://www.acf.hhs.gov/grants/open/HHS-2008-ACF-OCS-EI-0053.html. The final date to apply under that announcement was June 25, 2010.

[108] This program is sometimes referred to as Resident Opportunity and Supportive Services rather than Resident Opportunity and Self-Sufficiency.

[109] "About the Resident Opportunity and Self-Sufficiency Grant Program," U.S. Department of Housing and Urban Development, http://www.hud.gov/offices/pih/programs/ph/ross/about.cfm.

[110] ROSS is also the exclusive funding source for the Public Housing Family Self Sufficiency (PH FSS) program. ROSS grants for PH FSS fund PH FSS program coordinators, who implement and administer the PH FSS program at individual public and Indian housing facilities. These PH FSS program coordinators cannot provide case management services, though they do connect with local providers of services that might be useful for PH FSS program participants. Because of this limitation and because only PHAs are eligible to apply for this funding, PH FSS and the related-but-independently-funded Housing Choice Voucher Family Self Sufficiency (HCV FSS) program are not good fits for the CWF model.

[111] "About the Resident Opportunity and Self-Sufficiency Grant Program."

[112] Note that President Obama's FY 2011 budget request proposes eliminating the ROSS set-aside because "self-sufficiency activities are currently an eligible expense under the Operating Fund." See http://hud.gov/offices/cfo/reports/2011/cjs/public-housing-cf2011.pdf. As a result, the ROSS funding stream may prove unreliable, though it is important to remember that Congress has yet to draft and approve a final version of the FY 2011 budget.

[113] Anice S. Chenault, ROSS Program Manager, Department of Housing and Urban Development, Interview May 27, 2010.

[114] "ROSS Service Coordinators NOFA for FY 2009," U.S. Department of Housing and Urban Development, http://nhl.gov/offices/adm/grants/nofa09/rossslides.ppt.

[115] "ROSS Service Coordinators NOFA for FY2010," Docket No. FR-5415-N-20. U.S. Department of Housing and Urban Development, http://www.hud.gov/offices/adm/grants/nofa10/ross-sc.pdf.

[116] Ibid.

[117] Chanault.

[118] "Resident Opportunity and Supportive Services – ROSS Service Coordinators," Federal Catalog of Domestic Assistance, https://www.cfda.gov/?s=program&mode=form&tab=step1&id=e351a0f6bf09ed38efd0456064244c90.

[119] "ROSS Service Coordinators NOFA for FY 2009."

[120] "ROSS Service Coordinators NOFA for FY2010," Docket No. FR-5415-N-20, U.S. Department of Housing and Urban Development, Page 12, http://www.hud.gov/offices/adm/grants/nofa10/ross-sc.pdf.

[121] "About the Resident Opportunity and Self-Sufficiency Program."