



January 19, 2011

**TO:** Yolanda J. Butler, Ph.D.  
Acting Director  
Office of Community Services  
Administration for Children and Families

**FROM:** /Lori S. Pilcher/  
Assistant Inspector General for Grants, Internal Activities,  
and Information Technology Audits

**SUBJECT:** Results of Limited Scope Review at Raleigh County Community Action  
Association, Inc. (A-03-10-00252)

The attached final report provides the results of our limited scope review at Raleigh County Community Action Association, Inc. In accordance with the American Recovery and Reinvestment Act of 2009, the Office of Inspector General (OIG) will provide oversight of covered funds to prevent fraud, waste, and abuse.

Section 8L of the Inspector General Act, 5 U.S.C. App., requires that the Office of Inspector General (OIG) post its publicly available reports on the OIG Web site. Accordingly, this report will be posted at <http://oig.hhs.gov>.

If you have any questions or comments about this report, please do not hesitate to contact me at (202) 619-1175 or through email at [Lori.Pilcher@oig.hhs.gov](mailto:Lori.Pilcher@oig.hhs.gov). We look forward to receiving your final management decision within 6 months. Please refer to report number A-03-10-00252 in all correspondence.

Attachment

Department of Health & Human Services

**OFFICE OF  
INSPECTOR GENERAL**

**RESULTS OF LIMITED SCOPE REVIEW  
AT RALEIGH COUNTY COMMUNITY  
ACTION ASSOCIATION, INC.**



Daniel R. Levinson  
Inspector General

January 2011  
A-03-10-00252

# *Office of Inspector General*

<http://oig.hhs.gov>

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The mission of the Office of Inspector General (OIG), as mandated by Public Law 95-452, as amended, is to protect the integrity of the Department of Health & Human Services (HHS) programs, as well as the health and welfare of beneficiaries served by those programs. This statutory mission is carried out through a nationwide network of audits, investigations, and inspections conducted by the following operating components:

## *Office of Audit Services*

The Office of Audit Services (OAS) provides auditing services for HHS, either by conducting audits with its own audit resources or by overseeing audit work done by others. Audits examine the performance of HHS programs and/or its grantees and contractors in carrying out their respective responsibilities and are intended to provide independent assessments of HHS programs and operations. These assessments help reduce waste, abuse, and mismanagement and promote economy and efficiency throughout HHS.

## *Office of Evaluation and Inspections*

The Office of Evaluation and Inspections (OEI) conducts national evaluations to provide HHS, Congress, and the public with timely, useful, and reliable information on significant issues. These evaluations focus on preventing fraud, waste, or abuse and promoting economy, efficiency, and effectiveness of departmental programs. To promote impact, OEI reports also present practical recommendations for improving program operations.

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# *Notices*

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Section 8L of the Inspector General Act, 5 U.S.C. App., requires that OIG post its publicly available reports on the OIG Web site.

## **OFFICE OF AUDIT SERVICES FINDINGS AND OPINIONS**

The designation of financial or management practices as questionable, a recommendation for the disallowance of costs incurred or claimed, and any other conclusions and recommendations in this report represent the findings and opinions of OAS. Authorized officials of the HHS operating divisions will make final determination on these matters.

## **EXECUTIVE SUMMARY**

### **BACKGROUND**

The Community Services Block Grant (CSBG) program was authorized by the Community Opportunities, Accountability, and Training and Educational Services Act of 1998, P.L. 105-285 to provide funds to alleviate the causes and conditions of poverty in communities. Within the U.S. Department of Health & Human Services, the Administration for Children and Families (ACF), Office of Community Services administers the CSBG program. The CSBG program funds a State-administered network of more than 1,000 local Community Action Agencies (CAA) that create, coordinate, and deliver programs and services to low-income Americans. The CAAs provide services and activities addressing employment, education, housing, nutrition, emergency services, health, and better use of available income.

Under The American Recovery and Reinvestment Act of 2009, P.L. No. 111-5 (Recovery Act), enacted February 17, 2009, ACF received an additional \$1 billion for the CSBG program for States to alleviate the causes and conditions of poverty in communities. CSBG Recovery Act funds are distributed to CAAs using the existing statutory formula.

West Virginia's Governor's Office of Economic Opportunity (GOEO) acts as the lead agency for carrying out State activities for the CSBG program. GOEO is responsible for approving the State's CAA Recovery Act grant applications, and monitoring the CAAs for compliance with program regulations. GOEO was awarded an additional \$11,193,235 in Recovery Act funds for the State of West Virginia's CSBG program.

Raleigh County Community Action Association, Inc. (Raleigh), a private, nonprofit organization, provides services to over 2,100 households throughout Raleigh County in West Virginia. During fiscal year 2009, GOEO awarded Raleigh \$519,665 in Recovery Act CSBG funds, and \$341,857 in regular CSBG funds for a total of \$861,522 in CSBG grant funds. Raleigh also received Federal Head Start funds and funds from four other Federal Departments.

### **OBJECTIVE**

Our objective was to assess Raleigh's financial viability, capacity to manage and account for Federal funds and program performance requirements, and capability to operate its CSBG programs in accordance with Federal regulations.

### **SUMMARY OF FINDINGS**

Based on our assessment, Raleigh is financially viable, has the ability to manage and account for Federal funds, and is capable of operating its CSBG programs in accordance with Federal regulations. However, we noted weaknesses related to a lack of written policies and procedures for use of consultants and for determining CSBG-specific program eligibility.

## **RECOMMENDATION**

In determining whether Raleigh is appropriately managing and accounting for Recovery Act and regular CSBG grant funding, we recommend that ACF consider the information presented in this report in assessing Raleigh's ability to operate its CSBG programs in accordance with Federal regulations.

## **RALEIGH COUNTY COMMUNITY ACTION ASSOCIATION, INC., COMMENTS AND OFFICE OF INSPECTOR GENERAL RESPONSE**

In written comments on our draft report, Raleigh did not concur with our findings but described its corrective action plans to address them. We considered Raleigh's comments and maintain that our findings are valid. However, the actions that Raleigh described, if effectively implemented, will address the findings. Raleigh's comments are included in their entirety as the Appendix.

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## INTRODUCTION

### BACKGROUND

#### **Community Services Block Grant Program**

The Community Services Block Grant (CSBG) program was authorized by the Community Opportunities, Accountability, and Training and Educational Services Act of 1998, P.L. 105-285 (the CSBG Act), to provide funds to alleviate the causes and conditions of poverty in communities. Within the U.S. Department of Health & Human Services (HHS), the Administration for Children and Families (ACF), Office of Community Services administers the CSBG program. The CSBG program funds a State-administered network of more than 1,000 local Community Action Agencies (CAA) that create, coordinate, and deliver programs and services to low-income Americans. The CAAs provide services and activities addressing employment, education, housing, nutrition, emergency services, health, and better use of available income.

Under The American Recovery and Reinvestment Act of 2009, P.L. No. 111-5 (Recovery Act), enacted February 17, 2009, ACF received an additional \$1 billion for the CSBG program for States to alleviate the causes and conditions of poverty in communities. CSBG Recovery Act funds are distributed to CAAs using the existing statutory formula.

#### **West Virginia's Governor's Office of Economic Opportunity**

West Virginia's Governor's Office of Economic Opportunity (GOEO) acts as the lead agency for purposes of carrying out State activities for the CSBG program. GOEO is responsible for approving the State's CAA Recovery Act grant applications and monitoring the CAAs for compliance with program regulations. GOEO was awarded an additional \$11,193,235 in Recovery Act funds for the State of West Virginia's CSBG program.

#### **Raleigh County Community Action Association, Inc.**

Raleigh County Community Action Association, Inc. (Raleigh), a private, nonprofit organization, provides services to over 2,100 households throughout Raleigh County in West Virginia. During fiscal year 2009, GOEO awarded Raleigh \$519,665 in Recovery Act CSBG funds, and \$341,857 in regular CSBG funds for a total of \$861,522 in CSBG grant funds. Raleigh also received Federal Head Start funds and funds from four other Federal Departments.

#### **Requirements for Federal Grantees**

Pursuant to 45 CFR part 74, grantees of Federal awards must implement written accounting policies and procedures and maintain financial systems that provide for accurate and complete reporting of grant related financial data, effective control over grant funds, and allocation of costs to all benefitting programs. Nonprofit organizations that receive CSBG funds must comply with Federal cost principles found at 2 CFR part 230 (formerly Office of Management and Budget Circular A-122, *Cost Principles for Non-profit Organizations*). The HHS Grants Policy



Statement sets forth the general terms and conditions of HHS discretionary grants and cooperative agreement awards. The CSBG Act establishes the CSBG program and sets the requirements and guidelines for CSBG funds. *The State of West Virginia CSBG Regulatory Manual* (Regulatory Manual) establishes State requirements for programs operated with CSBG funds.

## **OBJECTIVE, SCOPE, AND METHODOLOGY**

### **Objective**

Our objective was to assess Raleigh's financial viability, capacity to manage and account for Federal funds and program performance requirements, and capability to operate its CSBG programs in accordance with Federal regulations.

### **Scope**

We conducted a limited review of Raleigh's financial viability, financial management system, program performance requirements, and related policies and procedures. Therefore, we did not perform an overall assessment of Raleigh's internal control structure. Rather, we reviewed only the internal controls that pertained directly to our objective.

We performed our fieldwork at Raleigh's administrative office in Beckley, West Virginia, during July 2010.

### **Methodology**

To accomplish our objective, we:

- confirmed that Raleigh is not excluded from receiving Federal funds;
- reviewed relevant Federal laws, regulations, and guidance;
- reviewed relevant State guidance;
- reviewed Raleigh's application and implementation of the grant awards for the Recovery Act funding;
- reviewed the findings related to the most recent State reviews;
- reviewed Raleigh's policies and procedures related to its CSBG programs;
- reviewed Raleigh's by-laws, minutes from the Board of Directors meetings, composition of Board, and organizational chart;
- performed audit steps to assess the adequacy of Raleigh's current financial systems; and

- reviewed Raleigh’s audited financial statements and supporting documentation for the period of January 1, 2006, through December 31, 2008.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

## **FINDINGS AND RECOMMENDATION**

Based on our assessment, Raleigh is financially viable, has the ability to manage and account for Federal funds, and is capable of operating its CSBG programs in accordance with Federal regulations. However, we noted weaknesses related to a lack of written policies and procedures for use of consultants and for determining CSBG-specific program eligibility.

### **POLICIES AND PROCEDURES**

Pursuant to 45 CFR § 74.44(a) grantees of Federal awards must implement written procurement procedures for solicitation of goods and services. Exhibit 4 of the HHS Grants Policy Statement, page II-33, requires grantees to have written policies for the use of consultants. Section VI of the Regulatory Manual states that grantees must implement written policies and procedures to govern programs operated with CSBG funds, including intake and eligibility procedures.

At the time of our audit, Raleigh did not have written policies and procedures regarding the use of consultants, specifically, procedures for selecting the most qualified individual available, for determining the nature and extent of the services to be provided, and for ensuring that the fees are reasonable in accordance with 2 CFR part 230, App. B § 37. From January through July 2010, Raleigh reported costs of \$25,103 for consultants.

Raleigh also did not implement written CSBG intake and eligibility procedures as required by the Regulatory Manual for 2009 awards.

### **RECOMMENDATION**

In determining whether Raleigh is appropriately managing and accounting for the CSBG Recovery Act and regular grant funding, we recommend that ACF consider the information presented in this report in assessing Raleigh’s ability to operate its CSBG programs in accordance with Federal regulations.

### **RALEIGH COUNTY COMMUNITY ACTION ASSOCIATION, INC., COMMENTS**

Raleigh did not concur with our finding that it did not have written policies and procedures regarding the use of consultants. Raleigh maintained that its existing purchasing and accounting procedures constituted a consultant policy, but indicated that it had instituted a corrective action plan to draft a consultant policy. Raleigh also maintained that CSBG-specific intake and

eligibility procedures were unnecessary because some of the CSBG services are supplemented by other funding sources and that the Regulatory Manual allows CAAs to provide these services subject to the eligibility guidelines of the other funding sources. However, Raleigh indicated that it had instituted a corrective action plan to add CSBG eligibility criteria to the intake procedures.

Raleigh's comments are included in their entirety as the Appendix.

#### **OFFICE OF INSPECTOR GENERAL RESPONSE**

Raleigh's procedures for procurement of services did not address HHS' Grants Policy Statement guidelines that require recipients to have written policies governing the use of consultants. We agree that, when CSBG services are supplemented by other funding sources, the Regulatory Manual allows CAAs to provide these services subject to the eligibility guidelines of the other funding sources. However, other services provided solely using CSBG funds are subject to the requirement for written CSBG intake and eligibility procedures. For these reasons we maintain that our findings are valid. However, the actions that Raleigh described, if effectively implemented, will address the findings.

# **APPENDIX**

**APPENDIX: RALEIGH COUNTY COMMUNITY ACTION ASSOCIATION  
INC., COMMENTS**

**Response to Findings and Recommendations  
Report Number A-03-10-00252**

Raleigh County Community Action Association Inc. *does not* concur with the findings presented in the draft report issued on October 5, 2010, and respectfully requests that the Office of Inspector General reconsider these findings based on the following responses:

***Finding: RCCAA lacks written policies and procedures for the use of consultants, specifically, procedures for selecting the most qualified individual available for determining the nature and extent of the services to be provided, and for ensuring that the fees are reasonable in accordance with 2 CFR part 23, Appendix B.***

Response: Raleigh County Community Action Association, Inc. *does not* concur with this finding. The HHS Grants Policy Manual requires that “Recipients must have written policies governing the use of consultants that are consistently applied regardless of the source of support. Such policies should include the conditions for paying consultant fees.” RCCAA has written purchasing procedures in place which govern the procurement of both goods and *services*. Under RCCAA’s current purchasing procedures, consultant services would be procured in the same manner as other services. Section 3.0 of RCCAA’s Purchasing Procedures (attachment 1) outlines what steps should be taken when planning for the purchase of goods and services and includes determining the agency’s need and avoid purchasing unnecessary items, the evaluation of lease versus purchase alternatives, the development of specifications including the requirements that each bidder must fulfill and other factors to be used in evaluating proposals, and the performance needs of the purchaser.

Section 3.3 of RCCAA’s current purchasing procedures also requires that “Cost comparisons, time needs, skills, and experience should also be utilized in decisions to hire or lease an employee.”

Section 5.1 of RCCAA’s current purchasing procedures (Attachment 2) requires the “Program Director to determine if items requested are necessary, allowable, allocable, and affordable in the current budget cycle,” thus fulfilling the requirement of 2 CFR part 230, Appendix B.

Raleigh County Community Action Association, Inc. also has an Accounting and Financial Policies and Procedures Manual which provides detailed information regarding when a worker is considered an Independent Contractor or an Employee (Attachment 3), and how a worker will be paid if they are designated as an independent contractor.

***Corrective Action Plan:***

Although Raleigh County Community Action Association, Inc. ***does not*** concur with the finding, a more concise Consultant Policy has been drafted and presented to the Board of Directors for review. The adoption of the Consultant Policy is on the Board of Directors' meeting agenda for the October 18, 2010 meeting, and if adopted, will be incorporated into the RCCAA Purchasing Procedures.

***Finding: Raleigh County Community Action Association, Inc. did not implement written CSBG intake and eligibility procedures as required by the Regulatory Manual for 2009 awards.***

Response: Raleigh County Community Action Association, Inc. ***does not*** concur with this finding. Although Section VI of the Governor's Office of Economic Opportunity CSBG Regulatory Manual for 2009 requires written policies and procedures including intake and eligibility procedures, the manual goes on to state that "Grantees may provide CSBG funded services to households with incomes up to 125% of the poverty guidelines. OMB poverty income guidelines apply to CSBG funded services and to services provided by CSBG funded staff. ***However, if CSBG funded staff provide services provided by other funding sources with income guidelines that differ from the CSBG guidelines, the other funding sources' guidelines shall apply for those services.***" (Attachment 4)

Page 66 of the RCCAA Management Guide (Attachment 5) contains intake procedures that must be used for all RCCAA programs. These procedures describe the process for verify income and entering information in the State's mandated system (DBA FacPro). When intake information is entered in to FacsPro, the system automatically calculates at what percentage of poverty to individual and family falls. The intake procedures require employees performing intakes to "see program procedures for additional program specific intake guidelines." Eligibility guidelines would fall under the "additional program specific intake guideline," given that many of the programs operated by RCCAA have different eligibility guidelines.

RCCAA utilizes its CSBG funds, in combination with various other funding sources including the Federal Transit Authority, the West Virginia Division of Transportation, the City of Beckley, and the Raleigh County Commission to operate the County's only Public Transportation Program. This program is open to anyone who needs public transportation, but is generally utilized by the elderly, disabled, and low income populations. The Public Transportation Program is improving the conditions in which low-income people live by improving and revitalizing the entire community. The outcomes of this effort are measured by the access to new, preserved, or expanded transportation resources available to low income people. The public transportation system operates in these low income areas and throughout Raleigh County. It would be

impossible to establish strict CSBG intake and eligibility criteria for a program with such a wide base of funding sources and such wide reaching community outcomes.

Because of the nature of the service, the lack of income based eligibility criteria of the other funding sources being used to fund the program, and the stipulation in the Regulatory Manual for 2009 that states if CSBG funded staff provide services provided by other funding sources with income guidelines that differ from the CSBG guidelines, the other funding sources' guidelines shall apply for those services; RCCAA does not feel that CSBG-specific eligibility criteria should be required in the program specific intake and eligibility procedures as required in the Regulatory Manual for 2009.

***Corrective Action Plan:*** Although Raleigh County Community Action Association, Inc. ***does not*** concur with the finding, in an effort to ensure that all CSBG requirements are clearly being met; CSBG eligibility criteria will be added to the intake procedures as established in the RCCAA Management Guide.

## **Section 3.0: Preparing For A Purchase**

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- 3.1 Preparing for a purchase:** Planning is a crucial element of purchasing. Employees must plan in advance what goods and services will be needed, the quantity, delivery location, and the time frame for which they need the goods and services.

When preparing for a purchase, the following steps should be taken:

- Determine the agency's need and avoid purchasing unnecessary items.
- Create specifications for the good or service.
- Consider lease versus purchase alternatives.
- Determine a time frame in which the good or service needs to be received.
- Determine to whom and where the goods should be delivered.
- Identify possible vendors.

- 3.2 Specifications:** A specification is a concise statement indicating the type of good or service, quantity, performance requirements, delivery options, usage information, and any special requirements.

Specifications should clearly state the following:

1. A clear and accurate description of the technical requirements for the good or service. Specifications may not be restrictive (prevent or limit competition) or be vague.
2. Requirement(s) that the bidder must fulfill and all other factors to be used in evaluating bids or proposals.
3. Brand Name(s) or Equal products desired.
4. Performance needs of the purchaser (indicate service, warranties, and what benefit the product should provide and minimum acceptable standards).
5. Design requirements (specifically state any requirements that the product must contain. Example: Copy paper must be white, 8 1/2" x 11").
6. To the extent practical, products and services should conserve natural resources, protect the environment, and be energy efficient.

The specifications should include a range of acceptable characteristics or minimum acceptable standards.

- 3.3** When appropriate an analysis is made of lease and purchase alternatives to determine which would be the most economical and practical procurement.
1. If the item or property is to be utilized on a short-term basis, it may be more economical to lease than purchase.
  2. If funding is not available to purchase, the item or property may be obtainable through leasing.
  3. If the item or property will become outdated in a short time period or requires costly and/or frequent maintenance, it may be better to lease than purchase.



4. If the cost of leasing an item for a certain period of time is greater than the cost to purchase, then the item or property should be purchased.
5. Care should be taken in assessing a proposed lease contract regarding:
  - a) The time length of the lease
  - b) Buyout/termination options of the lease (note cost)
  - c) Lessee and Lesser obligation of insurance, maintenance, and improvements of the item or property.
6. Cost comparisons, time needs, skills, and experience should also be utilized in decisions to hire or lease an employee.
7. Lease agreements with over a one-year program/project term must contain an addendum or clause allowing the Agency to terminate the lease with a 30-day notice if the governmental funding is reduced or eliminated or if the item or property is rendered unusable by fire, weather damage, or other unforeseen, uncontrollable circumstances through no fault of the Agency.

## **Section 5.0: Requisition of Purchase**

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### **5.1 Purchase Requisition:**

- Upon documentation of specification requirements, a purchase requisition must be completed.
- The purchase requisition must state in detail the quantity, item description, unit (case, gallon, box, package), price per unit, and amount of the total expenditure.
- The purchase requisition is to be completed by the employee requesting the good or service.
- Upon completion, the employee is to make a copy and forward the original form to the Program Director or his or her designee for approval.
- The Program Director will determine if the items requested are necessary, allowable, allocable, and affordable in the current budget cycle; then forward the Purchase Requisition to the Executive Director or his or her designee for approval.
- Recurring, scheduled purchases (i.e. utilities, rent, and telephone services) do not require a requisition after the initial requisition for service; however, the services should be re-evaluated annually to ensure that the contracts continue to meet the needs of the agency.

## PAYROLL AND RELATED POLICIES

### Classification of Workers as Independent Contractors or Employees

It is the policy of RCCAA to consider all relevant facts and circumstances regarding the relationship between RCCAA and the individual in making determinations about the classification of workers as independent contractors or employees. This determination is based on the degree of control and independence associated with the relationship between RCCAA and the individual. Facts that provide evidence of the degree of control and independence fall into three categories:

1. Behavioral control
2. Financial control
3. The type of relationship of the parties

Facts associated with each of these categories that will be considered by RCCAA in making employee/contractor determinations shall include:

1. Behavioral control:
  - a. Instructions given by RCCAA to the worker that indicate control over the worker (suggesting an employee relationship), such as:
    - (1) When and where to work
    - (2) What tools or equipment to use
    - (3) What workers to hire or to assist with the work
    - (4) Where to purchase supplies and services
    - (5) What work must be performed by a specified individual
    - (6) What order or sequence to follow
  - b. Training provided by RCCAA to the worker (i.e. employees typically are trained by their employer, whereas contractors typically provide their own training)
2. Financial control:
  - a. The extent to which the worker has unreimbursed business expenses (i.e. employees are more likely to be fully reimbursed for their expenses than is a contractor)
  - b. The extent of the worker's investment in the facilities/assets used in performing services for RCCAA (greater investment associated with contractors)
  - c. The extent to which the worker makes services available to the relevant market
  - d. How RCCAA pays the worker (i.e. guaranteed regular wage for employees vs. flat fee paid to some contractors)
  - e. The extent to which the worker can realize a profit or loss.

3. Type of Relationship:

- a. Written contracts describing the relationship that RCCAA and the individual intend to create
- b. Whether RCCAA provides the worker with employee-type benefits, such as insurance, paid leave, etc.
- c. The permanency of the relationship
- d. The extent to which services performed by the worker are a key aspect of the regular business of RCCAA

If an individual qualifies for independent contractor status, the individual will be sent a Form 1099 if total compensation paid to that individual for any calendar year, on the cash basis, is \$600 or more. The amount reported on a Form 1099 is equal to the compensation paid to that person during a calendar year (on the cash basis). Excluded from "compensation" are reimbursements of business expenses that have been accounted for by the contractor by supplying receipts and business explanations.

If an individual qualifies as an employee, a personnel file will be created for that individual and all documentation required by the RCCAA personnel policies shall be obtained. The policies described in the remainder of this section shall apply to all workers classified as employees.

- Intake procedure, including instructions for using all agency intake and application forms. GOEO requires that all grantees use the WV Universal Intake form for general service provision. Grantees may perform live intake via DBA FACS Pro™, but a signed disclaimer must be kept as part of the customer's hard copy files.
- Eligibility criteria, including the income verification period, income guidelines, eligibility period. GOEO requires that grantees have available a minimum of 1 month income documentation for all service records. These documents may be maintained in electronic format as long as they are part of the customer's DBA FACS Pro™ service record.
- United State residency verification procedures and criteria. GOEO requires that grantees verify residency through some form of legal residency documentation including driver's license, birth certificate or WV DHHR referral documents. These documents may be maintained in electronic format as long as they are part of the customer's DBA FACS Pro™ service record.
- Procedures for recertification of eligibility. GOEO requires that grantees document their process in customer recertification.
- Customer appeal procedure.
- Customer privacy rights.

Programs operated with CSBG funds must follow poverty income guideline limits set by the Federal DHHS.

Grantees may provide CSBG funded services to households with incomes up to 125% percent of the poverty income guidelines. OMB poverty income guidelines apply to CSBG funded services and to services provided by CSBG funded staff. However, if CSBG funded staff provide services funded by other sources with income guidelines that differ from the CSBG guidelines, the other funding sources' guidelines shall apply for those services.

### **CUSTOMER SERVICE RECORDS**

Determining allowable costs shall be referred to OMB Circular A-122 and meet the criteria as stated. ([www.whitehouse.gov/omb/circulars/index.html](http://www.whitehouse.gov/omb/circulars/index.html)) and refer to A-122) Records must be kept of each customer intake, whether later determined ineligible or not.

Intake forms must be uniform among all centers via the WV Universal Intake Form and include the following information:

- Date of intake;

## Intake Procedure

1. Every client that receives service from RCCAA must complete an intake form.
2. Intakes must be entered into DBA FACS Pro within 48 hours.
3. Intakes must be signed by the client and the staff member completing the intake.
4. Clients must sign the Privacy Posting Notice at the time of intake. An Income Verification Worksheet must also be completed and signed by the employee that verifies the income.
5. Proof of income should not be maintained within the client's file.
6. See program procedures for additional program specific intake guidelines.

**Raleigh County Community Action Association - Central Intake Form**

* Date: _____	
<b>Applicant Information (please check all that apply)</b>	
Address: _____	
First Name: _____ M.I. _____ Last Name: _____ Suffix: _____	
Mailing Address: _____ Physical Address: _____ Same as Mailing: <input type="checkbox"/>	
Address: _____ Address: _____	
City: _____ City: _____	
State: _____ Zip Code: _____ State: _____ Zip Code: _____	
<b>Personal Info:</b>	
SSN: _____ Date of Birth: _____ (MM / DD / YYYY)	
Reason for not providing SSN:	Phone Numbers:
<input type="checkbox"/> Confidential	Cell _____
<input type="checkbox"/> Refused	Home _____
<input type="checkbox"/> Unavailable - Cannot provide	Message _____
<input type="checkbox"/> Unknown - Will provide	Pager _____
Email address: _____	Work _____
<b>Demographics:</b>	
Gender: <input type="checkbox"/> Male <input type="checkbox"/> Female	Ethnicity: <input type="checkbox"/> Non-Hispanic <input type="checkbox"/> Hispanic / Latino
Marital Status:	Race:
<input type="checkbox"/> Divorced	<input type="checkbox"/> 1 Black
<input type="checkbox"/> Married	<input type="checkbox"/> 2 Multi-race
<input type="checkbox"/> Partner	<input type="checkbox"/> 3 White
<input type="checkbox"/> Separated	<input type="checkbox"/> 4 Other
<input type="checkbox"/> Single	
<input type="checkbox"/> Widowed	
Primary Language: English <input type="checkbox"/> Yes <input type="checkbox"/> No	Characteristics: (please select all that apply)
Specify: _____	<input type="checkbox"/> Applicant
	<input type="checkbox"/> Disabled
	<input type="checkbox"/> Migrant / Seasonal Worker
	<input type="checkbox"/> No Health Insurance
	<input type="checkbox"/> Veteran
Tribes: <input type="checkbox"/> Yes <input type="checkbox"/> No	
Specify: _____	
Family Type:	Education:
<input type="checkbox"/> Grandparent(s) (raising grandchildren)	<input type="checkbox"/> 0 - 8
<input type="checkbox"/> Multiple adults (no children)	<input type="checkbox"/> 9 - 12 / Non-graduate
<input type="checkbox"/> Multiple adults (living with children)	<input type="checkbox"/> High school graduate / GED
<input type="checkbox"/> Single parent female (living with children)	<input type="checkbox"/> 12+ some post secondary
<input type="checkbox"/> Single parent male (living with children)	<input type="checkbox"/> Some College/Certificate/Trade
<input type="checkbox"/> Single person (living alone)	<input type="checkbox"/> 2 or 4 year College Graduate
<input type="checkbox"/> Single person (living with partner)	<input type="checkbox"/> Post Graduate
<input type="checkbox"/> Two parent household (living with children)	<input type="checkbox"/> Unknown
Living Arrangements / Housing:	Dwelling Type:
<input type="checkbox"/> Homeless	<input type="checkbox"/> Site Built (Built from the bottom up)
<input type="checkbox"/> Living with friends or family	<input type="checkbox"/> Modular (doesn't have wheels)
<input type="checkbox"/> Own	<input type="checkbox"/> Doublewide
<input type="checkbox"/> Rent (subsidized - Hud, Section 8, etc.)	<input type="checkbox"/> Mobile Home
<input type="checkbox"/> Rent (unsubsidized)	<input type="checkbox"/> Mobile Home with add on
<input type="checkbox"/> Transitional / Shelter	<input type="checkbox"/> Row House
<input type="checkbox"/> Other	<input type="checkbox"/> Multi-family unit
	<input type="checkbox"/> Duplex
	<input type="checkbox"/> 3-4 Unit Rental
	<input type="checkbox"/> Shelter
	<input type="checkbox"/> Transitional
	<input type="checkbox"/> Other

**Applicant Information (continued)**

**Income:**  NO INCOME SOURCES

Source	Amount
Alimony / child support	
Dividends	
Educational Assistance	
Estates / trusts	
Interest / dividends	
Miscellaneous	
Outside / Public Assistance (not TANF)	
Pension / Retirement	
Rental Income	
Royalties	
Social Security	
SSI	
TANF	
Unemployment	
Veteran's Benefits	
Worker's Compensation	
<b>TOTAL</b>	

**Non-cash**  
Food Stamps, housing subsidies, etc.

**Other System ID:**

Source	Number
Driver's License	
Insurance	
CHIP's	
WXID #	
Other	
Other	

**Emergency:**

Name	Contact Info	Relationship

**Previous Service Info:**

Has anyone in this household ever received assistance from RCCAA?  Yes  No

If Yes, what services? \_\_\_\_\_ When? \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**Miscellaneous Info:**

Which of the following do you need help with right now?  
*Note: This agency may not provide all of these services, but this information may help in providing you with referrals.*

<input type="checkbox"/> Abuse intervention	<input type="checkbox"/> Home buyers assistance	<input type="checkbox"/> Senior long-term care
<input type="checkbox"/> Addiction help	<input type="checkbox"/> Home repair/rehab	<input type="checkbox"/> Shelter
<input type="checkbox"/> Budget/credit counseling	<input type="checkbox"/> Home Weatherization	<input type="checkbox"/> Tax assistance
<input type="checkbox"/> Child care	<input type="checkbox"/> Job Assistance	<input type="checkbox"/> Transportation
<input type="checkbox"/> Child medical insurance	<input type="checkbox"/> Legal	<input type="checkbox"/> Utilities
<input type="checkbox"/> Clothing	<input type="checkbox"/> Literacy, GED prep/test	<input type="checkbox"/> Other: (please explain)
<input type="checkbox"/> Counseling	<input type="checkbox"/> Medical care	_____
<input type="checkbox"/> Food	<input type="checkbox"/> Head Start / Parenting skills	_____
<input type="checkbox"/> Food Stamps	<input type="checkbox"/> Rent	_____

**Who referred you to us?**

Family

Friend

Internet website

Phone book

Radio

Television

Other Agency:(which?) \_\_\_\_\_

**Customer Confidentiality and Release of Information Consent**

I, \_\_\_\_\_, give Raleigh County Community Action Association, Inc. consent to release, obtain and share all pertinent identifying and nonconfidential social, medical and other information about myself that will allow me to benefit from services offered. In granting such permission, I understand that such information will remain confidential and that such information will only be used for my benefit or to benefit other members of my family. Only authorized personnel will share client information needed for service delivery, to track demographic trends, service patterns and the client outcomes achieved. I release Raleigh County Community Action Association, Inc. and its staff from any legal liability for disclosing or acquiring information that I have permitted by signing this form. Unless I make a formal request to CAA Name that I no longer want to participate in the services offered, this release will remain in force for 3 years from today. The statements made by me on this consent form are true, correct and complete to the best of my knowledge.

Signature of Customer \_\_\_\_\_

I have explained to \_\_\_\_\_ the purpose of this release and the disclosure that might reasonably be anticipated.

Signature of RCCAA staff member \_\_\_\_\_

Date \_\_\_\_\_

If you have any questions or concerns, please don't hesitate to contact us at:

Raleigh County Community Action Association

Address 299 Grey Flats Road  
P.O. Box 3066  
City, State ZIP Beckley, WV 25801  
Phone - FAX 304-252-6396 - 255-9138  
Email \_\_\_\_\_  
Web \_\_\_\_\_