



State of New Jersey

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Office of Community Services (OCS) Community Services Block Grant Non-Discretionary (CSBG-ND)

PROGRAM POLICY BULLETIN #19-02

DATE: July 23, 2019

TO: NJ Community Action Agencies (CAA)
Executive Directors

AFFECTED PROGRAMS: All Programs Utilizing Community Services Block Grant Non-Discretionary (CSBG-ND) Funds

SUPERSEDES: PPB #12-01

SUBJECT: Financial Status Reports (FSR) and Advances

POLICY SUMMARY: This policy outlines the FSR process for reimbursement of program costs and the advance process for CSBG-ND grants. As of the date of this policy revision, and beginning with FFY2020 contracts, all CSBG-ND grantees shall bill, at minimum, once in each quarter during the term of the grant contract, and shall not receive expedited payment processing more than once in any contract term. Contracts designated as High Risk shall be permitted two expedited payments. Advances shall be provided to all grantees requesting an advance, except where prohibited by the terms of a High Risk contract. Grantees subject to a debt offset per SAM.gov shall not receive advances until such time as SAM.gov reflects that the notification of debt offset has been removed. With the FFY2020 application, agencies will be required to upload a copy of the board meeting schedule for the upcoming year.

DISCUSSION: CSBG-ND grantees are required to submit requests for reimbursement via an FSR in the System for Administering Grants Electronically (SAGE).

OCS staff review the following required items when processing an FSR:

- General Ledger for the CSBG expenses
- Cash Disbursement Ledger (check register) for the CSBG expenses
- EmpowOR ROMA Quarterly Report
- Board Meeting Minutes
- Board composition listing in SAGE

General Ledger and Cash Disbursement Ledgers:

The General Ledger and Cash Disbursement Ledger should be provided for CSBG costs only. Versions of these ledgers that include costs covered by other sources shall have the CSBG costs highlighted. Both ledgers shall follow the same order when listing expense groupings and be separated by program. Uploads shall have files clearly labeled and the documents themselves shall be labeled with the agency name, contract year and column headings. Each grouping shall include a subsection total of CSBG expenses, so that DCA staff may easily cross reference the costs on these ledgers to the costs that appear in the FSR in SAGE. Payroll reimbursement requests shall be substantiated with a copy of the payroll report.

EmpowOR ROMA Data Quarterly Reports:

EmpowOR Quarterly Reports shall be sent directly to the Grant Manager for review no more than 30 days from the end of each quarter. FSRs will not be processed until EmpowOR reporting is current and complete.

Board Meeting Minutes:

Prior to, or at the time of the FSR submission, each agency shall provide to the Grant Manager a copy of the most recently approved Board meeting minutes. Board meetings are expected to be held according to the schedule outlined in the agency's by-laws, and according to the Board calendar as uploaded with the agency's application (as of FFY2020 application). Where the most recent Board meeting minutes have not yet been approved, we would expect a copy of the draft minutes to be provided for use in reviewing the FSR. Due to the wide variation in Board meeting patterns, please provide the Grant Manager a brief note on letterhead when a scheduled Board meeting has been cancelled so that the Grant Manager shall not expect the submission of draft or final minutes from that meeting. FSRs will not be processed until minutes have been received.

Board listings in SAGE:

Grantees are required to maintain up to date listings of board members and membership terms in the SAGE system. At the review of an FSR, the Grant Manager reviews and electronically files a copy of the current SAGE Board listing. Grant Managers will ensure that the Board appointments are current, that the board is full pursuant to the agency's by-laws, and that the Board is tri-partite. When an agency's current board constellation, as reflected in SAGE, is out of compliance, but **within a 90-day window of that non-compliance, the FSR will be paid.** The

Grant Manager will email the grantee a reminder of the upcoming non-compliance, and make a note in the SAGE file.


When an agency's board listing demonstrates that the membership configuration is out of compliance for **more than 90 days, the FSR will not be paid.** The Grant Manager shall notify the grantee electronically and post this email to the SAGE notes system. As soon as the board configuration is back in compliance, the FSR will be processed.

Agencies will be notified of any questions about documentation and the FSR shall be returned for modifications. FSRs shall be processed when these issues are resolved or adjustments are made to the FSR. In addition to the above documentation, grantees are required to maintain sufficient records in accordance with all applicable laws to substantiate any expenditure claimed under the CSBG program. Such substantiation shall include, but is not limited to, contracts, invoices, bills, cancelled checks, payment receipts, payroll records and other similar documentation. Any reported and approved expenses found at a later date to be unsupported by sufficient documentation beyond the documentation provided at the time of the FSR submittal, must be refunded.

Advances

Agencies that are unable to obtain an advance at the beginning of the grant term due to a SAM.gov debt offset may, upon clearance of this designation, request an advance at any time during the contract term, with the exception of contracts designated as High Risk where an advance is specifically precluded.

Delinquent billing shall be included in the scoring calculation for each agency's annual application.



Kate Butler
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Division of Housing & Community Resources