

2024/2025 Community Needs Assessment and Community Action Plan

California Department of Community Services
and Development

Community Services Block Grant



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Introduction

The Department of Community Services and Development (CSD) has developed the 2024/2025 Community Needs Assessment (CNA) and Community Action Plan (CAP) template for the Community Services Block Grant (CSBG) Service Providers network. Each agency must submit a completed CAP, including a CNA to CSD on or before **June 30, 2023**. Changes from the previous template are detailed below in the “What’s New for 2024/2025?” section. Provide all narrative responses in 12-point Arial font with 1.15 spacing. When the CNA and CAP are complete, they should not exceed 65 pages, excluding the appendices.

Purpose

Public Law 105-285 (the CSBG Act) and the California Government Code require that CSD secure a CAP, including a CNA from each agency. Section 676(b)(11) of the CSBG Act directs that receipt of a CAP is a condition to receive funding. Section 12747(a) of the California Government Code requires the CAP to assess poverty-related needs, available resources, feasible goals, and strategies that yield program priorities consistent with standards of effectiveness established for the program. Although CSD may prescribe statewide priorities or strategies that shall be considered and addressed at the local level, each agency is authorized to set its own program priorities in conformance to its determination of local needs. The CAP supported by the CNA is a two-year plan that shows how agencies will deliver CSBG services. CSBG funds are by their nature designed to be flexible. They shall be used to support activities that increase the capacity of low-income families and individuals to become self-sufficient.

Federal CSBG Programmatic Assurances and Certification

The Federal CSBG Programmatic Assurances are found in section 676(b) of the CSBG Act. These assurances are an integral part of the information included in the CSBG State Plan. A list of the assurances that are applicable to CSBG agencies has been provided in the Federal Programmatic Assurances section of this template. CSBG agencies should review these assurances and certify that they are complying.

State Assurances and Certification

As required by the CSBG Act, states are required to submit a State Plan as a condition to receive funding. Information provided in agencies’ CAPs will be included in the CSBG State Plan. Alongside Organizational Standards, the state will be reporting on [State Accountability Measures](#) in order to ensure accountability and program performance improvement. A list of the applicable State Assurances and the agency certification for them are found in the State Assurances section of this template.

Compliance with CSBG Organizational Standards

As described in the Office of Community Services (OCS) [Information Memorandum \(IM\) #138](#) dated January 26, 2015, CSBG agencies will comply with implementation of the Organizational Standards. CSD has identified the Organizational Standards that are met through the completion of the CAP and the CNA. A list of Organizational Standards that will be met upon completion of the CAP can be found in the Organizational Standards section of this template. Agencies are encouraged to utilize this list as a resource when reporting on the Organizational Standards annually.

What's New for 2024/2025?

Community Action Plan Workgroup (CAPWG). In summer 2022, CSD organized a workgroup to inform the development of the 2024/2025 CNA and CAP. Workgroup members were selected from the CSBG Service Provider network and the ROMA Coalition. The feedback CSD received from the workgroup has informed not only the 2024/2025 template but also the accompanying CAP training scheduled for mid-December 2022.

Public Hearings – Additional Guidance. The public hearing requirement has been modified. Two years ago, we were in an active pandemic due to the COVID-19 virus. The public health guidelines throughout the state advised communities against large gatherings. CSD advised agencies to follow public health protocols and hold public meeting virtually if an in-person meeting was not an option. For the public hearing on the 2024/2025 draft CAP, CSD requests that agencies conduct in-person, virtual, or hybrid public hearings. While transmission rates of COVID-19 remain high in many communities, agencies are requested to follow their local public health guidelines when deciding in which format to conduct the public hearing. For more information, please see the Public Hearing section of this template.

CNA Helpful Resources. The Helpful Resources section in Part I: Community Needs Assessment contains additional data sets and resources. On recommendation of the CAPWG, CSD has added data sets from the Massachusetts Institute of Technology, the University of Wisconsin, and a point-in-time data set from the U.S. Department of Housing and Urban Development. We have also added links to the Local Agencies Portal where you can find examples of completed Community Needs Assessments and project timelines from the CSBG Service Providers network.

Part II: Community Action Plan. The number of questions in the Tripartite Board of Directors, Service Delivery System, Linkages and Funding Coordination, and Monitoring sections has changed. Questions were removed because it was determined that agencies meet these reporting requirements through other CSBG work products such as monitoring and Organizational Standards. In the Service Delivery System and Linkages and Funding Coordination sections, new questions were added. These questions will be covered during the template training webinar.

Sunset of COVID-19 Flexibilities. In the 2022/2023 template, CSD allowed agencies to indicate on selected questions whether there were changes to the response provided in the 2020-2021 CAP or whether agencies would like CSD to accept the 2020-2021 response without adaptations. This option was an effort to reduce administrative burden on agencies during the COVID-19 pandemic. While

CSD has retained some of the flexibilities developed in the previous template, the option for agencies to reference responses in their prior CAP has been discontinued.

Response and Community Awareness. This section replaces the “Additional Information” section in the previous template. For 2024/2025 CSD has included questions pertaining to Diversity, Equity, and Inclusion (DEI). The questions about disaster preparedness have been retained from the previous template. While none of this information is directly mandated by statute, CSD is requesting the information to gauge where the CSBG Service Provider network is as a whole on these topics. Responses to the questions in this section are mandatory.

ROMA Certification Requirement. Under section 676(b)(12) of the CSBG Act, CSD and all CSBG agencies are required to assure that we will participate in a Results Oriented Management and Accountability System “not later than fiscal year 2001.” CSD and the CSBG Service Providers have fulfilled this requirement through various approaches. With respect to the ROMA certification of the network CAPs (Organizational Standard 4.3), CSD has allowed agencies to submit their CAP without the signature of a ROMA trainer or implementer if the agency did not have a ROMA trainer or implementer on staff. CSD staff who had the requisite training would certify those CAPs on behalf of the agencies. This process will still be in place for the 2024/2025 template. However, for the 2026/2027 template, CSD will require that CSBG Service Providers provide their own ROMA certification either by staff who have the required ROMA training or in partnership with another agency or organization. CSBG Service Providers should begin formulating a plan to fulfill this requirement.

Checklist

- ☐ **Cover Page and Certification**
- ☐ **Public Hearing(s)**

Part I: Community Needs Assessment

- ☐ **Narrative**
- ☐ **Results**

Part II: Community Action Plan

- ☐ **Vision Statement**
- ☐ **Mission Statement**
- ☐ **Tripartite Board of Directors**
- ☐ **Service Delivery System**
- ☐ **Linkages and Funding Coordination**
- ☐ **Monitoring**
- ☐ **Data Analysis, Evaluation, and ROMA Application**
- ☐ **Response and Community Awareness**
- ☐ **Federal CSBG Programmatic Assurances and Certification**
- ☐ **State Assurances and Certification**
- ☐ **Organizational Standards**
- ☐ **Appendices**

COMMUNITY SERVICES BLOCK GRANT (CSBG)

2024/2025 Community Needs Assessment and Community Action Plan

Cover Page and Certification

Agency Name	Center for Employment Training
Name of CAP Contact	Arnise "Erica" Dejohnette
Title	Director of Contracts, Planning and MIS
Phone	(909)478 x1777
Email	ericah@cetweb.edu

CNA Completed MM/DD/YYYY:
(Organizational Standard 3.1)

05/12/2023

Board and Agency Certification

The undersigned hereby certifies that this agency complies with the Federal CSBG Programmatic, and State Assurances as outlined in the CSBG Act and California Government Code, respectively for services provided under the Federal Fiscal Year 2024/2025 Community Action Plan. The undersigned further certifies the information in this Community Needs Assessment and the Community Action Plan is correct and has been authorized by the governing body of this organization. (Organizational Standard 3.5)

Board Chair (printed name)	Board Chair (signature)	Date
Executive Director (printed name)	Executive Director (signature)	Date

Certification of ROMA Trainer/Implementer (If applicable)

The undersigned hereby certifies that this agency's Community Action Plan and strategic plan documents the continuous use of the Results Oriented Management and Accountability (ROMA) system (assessment, planning, implementation, achievement of results, and evaluation).

NCRT/NCRI (printed name)	NCRT/NCRI (signature)	Date

CSD Use Only

Dates CAP (Parts I & II)		Accepted By
Received	Accepted	

Public Hearing(s)

California Government Code Section 12747(b)-(d)

State Statute Requirements

As required by California Government Code Section 12747(b)-(d), agencies are required to conduct a public hearing for the purpose of reviewing the draft CAP. All testimony presented by low-income individuals and families during the public hearing shall be identified in the final CAP. Agencies shall indicate whether or not the concerns expressed by low-income individuals and families have been addressed. If an agency determines that any of the concerns have not been addressed in the CAP, the agency shall include in its response document, information about the concerns and comment as to their validity.

Guidelines

Notice of Public Hearing

1. Notice of the public hearing and comment period must be published at least 15 calendar days prior to the public hearing.
2. The notice may be published on the agency's website, social media channels, and/or in newspaper(s) of local distribution.
3. The notice must include information about the draft CAP; where members of the community may review, or how they may receive a copy of, the draft CAP; the dates of the comment period; where written comments may be sent; date, time, and location of the public hearing; and the agency contact information.
4. The comment period should be open for at least 15 calendar days prior to the public hearing. Agencies may opt to extend the comment period for a selected number of days after the hearing.
5. The draft CAP must be made available for public review and inspection at least 30 days prior to the public hearing. The draft CAP can be posted on the agency's website, social media channels, and distributed electronically or in paper format.
6. Attach a copy of the Notice(s) of Public Hearing as Appendix A to the final CAP.

Public Hearing

1. Agencies must conduct at least one public hearing on the draft CAP.
2. Public hearing(s) will be held in the designated CSBG service area(s).
3. Low-income testimony presented at the hearing or received during the comment period must be memorialized verbatim in the Low-Income Testimony and Agency's Response document and appended to the final CAP as Appendix B.
4. The Low-Income Testimony and Agency's Response document should include the name of low-income individual, his/her verbatim testimony, an indication of whether or not the need was addressed in the draft CAP, and the agency's response to the testimony if the concern was not addressed in the draft CAP.

Additional Guidance

COVID-19 poses unique challenges to fulfilling the public hearing requirement. CSD asks that agencies continue to adhere to state and local public health guidance to slow the spread of the virus and ensure public safety. The health and safety of agency staff and the communities you serve is paramount. Therefore, for the purposes of fulfilling the public hearing requirement on the draft CAP, agencies may conduct the public hearing in-person, remotely, or using a hybrid model (in-person and remotely) based on the public health protocols in place in their communities.

Public Hearing Report

Date(s) of Public Hearing(s)	6/12/2023, 6/13/2023, 6/14/2023
Location(s) of Public Hearing(s)	Soledad, Santa Maria, El Centro
Dates of the Comment Period(s)	5/12/2023 – 6/16/2023
Where was the Notice of Public Hearing published? (agency website, newspaper, social media channels)	TBA
Date the Notice(s) of Public Hearing(s) was published	TBA
Number of Attendees at the Public Hearing(s) (Approximately)	TBD

Part I: Community Needs Assessment

CSBG Act Section 676(b)(11)

California Government Code Section 12747(a)

Helpful Resources

In 2011, NASCSP published a [Community Action to Comprehensive Community Needs Assessment Tool](#) that supports planning and implementing a comprehensive CNA. The tool lays out design choices, planning steps, implementation practices, analysis, and presentation options.

The National Community Action Partnership has an [Assessment Tool](#) designed specifically for the community needs assessment process. Here you can select from a variety of county-specific data sets.

Examples of Community Needs Assessments and project timelines from agencies within the California CSBG Providers network can be found on the [Local Agencies Portal](#) under the CSBG – Resources tab. If you do not have an account or have not received CSD login credentials, please email CSD at ExternalAccess@csd.ca.gov.

To provide a comprehensive “picture” of the community needs in your service area(s), agencies will collect and analyze both quantitative and qualitative data. Links to several national and state quantitative data sets are given below. Local and agency data also provide information about the needs of the community.

Sample Data Sets			
U.S. Census Bureau Poverty Data	U.S. Bureau of Labor Statistics Economic Data	U.S. Department of Housing and Urban Development Housing Data & Report	
HUD Exchange PIT and HIC Data Since 2007	National Low-Income Housing Coalition Housing Needs by State	National Center for Education Statistics IPEDS	
Massachusetts Institute of Technology Living Wage Calculator		University of Wisconsin Robert Wood Johnson Foundation County Health Rankings	
California Department of Education School Data via DataQuest	California Employment Development Department UI Data by County	California Department of Public Health Various Data Sets	
California Department of Finance Demographics	California Attorney General Open Justice	California Governor's Office Covid-19 Data	California Health and Human Services Data Portal
CSD Census Tableau Data by County			Population Reference Bureau KidsData

Community Needs Assessment Narrative

CSBG Act Sections 676(b)(3)(C), 676(b)(9)

Organizational Standards 1.1, 1.2, 1.3, 2.2, 3.2, 3.3, 3.4

1. Describe how your agency collected and included current data specific to poverty and its prevalence related to gender, age, and race/ethnicity for your service area. (Organizational Standard 3.2)

CET collected and included current data specific to poverty and its prevalence related to gender, age, and race/ethnicity through several means including utilizing data obtained from U.S. Census Bureau, U.S. Bureau of Labor Statistics, California Employment Development Department, California Department of Education, U.S. Department of Housing and Urban Development, National Low-Income Housing Coalition, California Department of Public Health, HUD Exchange, California Health and Human Services, as well as CET's Student Needs Assessment Survey and internal reports drawn from CET Management Information System (MIS). The data was included to raise the visibility of existing disparities based upon gender, age, and race/ethnicity that evidence the need for an informed approach to ensure equitable distribution of resources.

2. Describe the geographic location(s) that your agency is funded to serve with CSBG. If applicable, include a description of the various pockets, high-need areas, or neighborhoods of poverty that are being served by your agency.

CET's service areas encompass 18 counties which include: 1) Santa Clara, Alameda, Santa Cruz, San Mateo, San Francisco, San Benito and Monterey counties in the Central Coast Region, 2) Santa Barbara, San Luis Obispo, Ventura, Orange, Los Angeles, and San Diego counties in the South Coast Region, and 3) Imperial, Riverside, San Bernardino, Mono and Inyo counties in the Desert Region. According to the State of California website, 10% of US census tracts are recognized as a Qualified Opportunity Zone (QOZ), meaning they meet one of three criteria under the definition of "low-income community" defined by both poverty and median family income in Internal Revenue Code Section 45D(e). California is home to 879 designated opportunity zone census tracts, with 57 counties having at least 1 opportunity zone. Of the 18 counties CET serves, 17 counties have QOZ census tracts, making up 65% of CA QOZs: Santa Clara (13), Alameda (47), Santa Cruz (4), San Mateo (4), San Francisco (11), San Benito (2), Monterey (9), Santa Barbara (7), San Luis Obispo (3), Ventura (8), Orange (27), Los Angeles (274), San Diego (47), Imperial (7), Riverside (49), San Bernardino (57), and Inyo (2). CET center locations are strategically located to be accessible to low-income populations which are most in need. Our 10 California centers are in San Jose, Watsonville, Soledad, Salinas, Coachella, Colton, Santa Maria, Oxnard, San Diego, and El Centro.

3. Indicate from which sources your agency collected and analyzed quantitative data for the CNA. (Check all that apply.) (Organizational Standard 3.3)

Federal Government/National Data Sets

- ☒ Census Bureau
- ☒ Bureau of Labor Statistics
- ☒ Department of Housing & Urban Development
- ☒ Department of Health & Human Services
- ☒ National Low-Income Housing Coalition
- ☐ National Center for Education Statistics
- ☐ Academic data resources
- ☐ Other online data resources
- ☐ Other

Local Data Sets

- ☐ Local crime statistics
- ☒ High school graduation rate
- ☐ School district school readiness
- ☐ Local employers
- ☐ Local labor market
- ☐ Childcare providers
- ☐ Public benefits usage
- ☐ County Public Health Department
- ☐ Other

California State Data Sets

- ☒ Employment Development Department
- ☒ Department of Education
- ☒ Department of Public Health
- ☐ Attorney General
- ☐ Department of Finance
- ☐ State Covid-19 Data
- ☐ Other

Surveys

- ☒ Clients
- ☐ Partners and other service providers
- ☐ General public
- ☐ Staff
- ☐ Board members
- ☐ Private sector
- ☐ Public sector
- ☐ Educational institutions

Agency Data Sets

- ☒ Client demographics
- ☐ Service data
- ☐ CSBG Annual Report
- ☐ Client satisfaction data
- ☐ Other

4. If you selected "Other" in any of the data sets in Question 4, list the additional sources.

5. Indicate the approaches your agency took to gather qualitative data for the CNA. (Check all that apply.) (Organizational Standard 3.3)

Surveys

- ☒ Clients
- ☐ Partners and other service providers
- ☐ General public
- ☐ Staff
- ☐ Board members
- ☐ Private sector
- ☐ Public sector
- ☐ Educational institutions

Interviews

- ☐ Local leaders
- ☐ Elected officials
- ☒ Partner organizations' leadership
- ☐ Board members
- ☐ New and potential partners
- ☐ Clients

Focus Groups

- ☐ Local leaders
- ☐ Elected officials
- ☐ Partner organizations' leadership
- ☐ Board members
- ☐ New and potential partners
- ☐ Clients
- ☐ Staff

☐ **Community Forums**☐ **Asset Mapping**☐ **Other**

6. If you selected “Other” in Question 6, please list the additional approaches your agency took to gather qualitative data.

N/A

7. Describe your agency’s analysis of the quantitative and qualitative data collected from low-income individuals and families. (Organizational Standards 1.1, 1.2, 3.3)

CET’s initial analysis entailed a broad look at data pertaining to our target population at a national level to identify core characteristics and issues facing the community on a large scale. CET then conducted research at the state and local level (county/city) across service areas to identify patterns. Data was analyzed based on demographic information including, but not limited to, race, gender, age, income, education level, and English proficiency.

8. Summarize the data gathered from each sector of the community listed below and detail how your agency used the information to assess needs and resources in your agency’s service area(s). Your agency must demonstrate that each sector was included in the needs assessment; A response for each sector is required. (CSBG Act Sections 676(b)(3)(C), 676(b)(9), Organizational Standard 2.2)

A. Community-based organizations

Data was gathered via interviews with leadership at California Rural Legal Association and Center for Farmworker Families. Dr. Lopez with Center for Farmworker Families stated housing as the top need for communities living in poverty, stating that farmworkers have never had decent affordable housing. Dr. Lopez outlined three items that would transform the lives of migrant and seasonal farmworkers: 1) comprehensive immigration reform, 2) a living wage, and 3) contracts with growers. The Center for Farmworker Families hosts monthly distributions of food, goods and household items. Following the winter storms which flooded many areas forcing evacuations, over 1,000 sought assistance, a revealing increase from previous months where the turnout was between 300-350. Many farmworker families are still being sheltered at the Santa Cruz Fairgrounds, not knowing if or when they will be able to return to their homes.

Center staff at each of CET’s ten locations spanning from Santa Clara County to Imperial County work with local community-based organizations on a regular basis to offer resources and keep abreast of the pertinent issues facing individuals and families in need. As a recipient of Workforce Innovation and Opportunity Act Title I funding, CET is a mandated partner of local America’s Job Centers of California (AJCC). The AJCC is a collaboration of local, state, private and public entities that provide comprehensive and innovative employment services and resources to meet the needs of the California workforce. CET Soledad collaborates with South County Outreach Effort (SCORE) which joins over 40 nonprofit organizations to coordinate services to South County Residents. CET El Centro partners with Campesinos Unidos to address immediate needs of the low-income population including food, housing, homeless prevention services, and utility assistance. CET San

Diego works with Second Chance a non-profit dedicated to providing justice-involved individuals with life-saving resources needed to break the cycle of addiction, poverty and incarceration. CET Watsonville works with the Community Action Board of Santa Cruz County to offer supportive services for utilities and housing as well as partnering to coordinate disaster relief outreach.

B. Faith-based organizations

Center for Employment Training (CET) partners with Catholic Charities of California to gauge the most pressing needs of communities impacted by poverty and to coordinate services to aid participants with CalFresh benefits, emergency preparedness, disaster case management, health coverage as well as immigration legal services. CET also collaborates with Sacred Heart Community Service which lists food and nutrition, housing, lack of jobs, transportation and health as top needs.

C. Private sector (local utility companies, charitable organizations, local food banks)

CET works closely with local food banks across services areas to address hunger in communities impacted by poverty. Food Bank for Monterey County reports that 1 in 4 residents is hungry, with 34% of residents and 66% of farmworkers are food insecure. According to data gathered from their website, Monterey County ranks among the highest in all 58 California counties in child poverty, childhood homelessness, and incidence of Type 2 diabetes. Monterey County has more homeless students than San Francisco and San Jose combined. During the onset of the Covid-19 pandemic, demand for food quadrupled. The Imperial Valley Food Bank reports distribution to over 25,000 people monthly across 30 locations. 1 in 5 seniors in Imperial County live below the poverty line. Through the Senior Food Program funded through USDA, over 700 low-income seniors receive food distribution each month. In addition, Imperial Valley Food Bank administers a Weekend Backpack Program to address the 1 in 3 children that are food insecure. The backpack program helps to alleviate the stigma of food insecurity by discreetly providing over 700 students with backpacks of food each Friday to keep them fed throughout the weekend.

D. Public sector (social services departments, state agencies)

Data collected from the California Employment Development Department revealed high unemployment rates across CET service areas. The state unemployment rate as of March 2023 (not seasonally adjusted) is 4.8 percent, whereas Imperial County is at 15.6%, Monterey is at 9.6%, Santa Cruz is at 6.9% and San Benito is at 6.7%. Further analysis of the data revealed communities experiencing substantially higher rates of unemployment where CET participants live as well as where CET centers are located: Watsonville 17% (Santa Cruz County), Calexico 22.4% and Calipatria 16.7% (Imperial County), Pajaro 29.2% and Soledad 16.6% (Monterey County), Coachella 8.1% and Mecca 11.2% (Riverside County), as well as Santa Maria 8.5% (Santa Barbara County).

Data collected from the U.S. Census Bureau evidenced higher incidences of poverty based

on gender, age, race/ethnicity, and level of educational attainment. A closer look at race/ethnicity consistently show Black, Indigenous, People of Color (BIPOC) a much larger share of groups living in poverty when compared to the BIPOC's share of the overall population.

E. Educational institutions (local school districts, colleges)

Data collected from the California Department of Education show lower 4-year graduation rates amongst BIPOC students when compared with their White counterparts, as well as substantial percentage point differences when factoring in characteristics such as English Learners, Foster Youth, Homeless Youth, Migrant Education, Socioeconomically Disadvantaged, and Students with Disabilities.

Data collected from the California Department of Education website also showed a high enrollment or percentage of participant families qualifying for free or reduced-price school meals within CET service areas.

9. "Causes of poverty" are the negative factors that create or foster barriers to self-sufficiency and/or reduce access to resources in communities in which low-income individuals live. After review and analysis of the data, describe the causes of poverty in your agency's service area(s). (Organizational Standard 3.4)

Lack of Affordable Housing

Data collected from state, county and local sources document a lack of affordable housing as being the most prevalent need impacting individuals and families. Homelessness continues to grow in California. The 2022 U.S. Department of Housing and Urban Development's "Point In Time" (PIT) count of the nation's homeless population revealed 30% of the overall count of people experiencing homelessness living in California (171,521/582,462), as well as half of all unsheltered people (115,491/233,282).

According to the National Low Income Housing Coalition, extremely low income households (incomes at or below the poverty guideline or 30% of their area median income) are struggling to find affordable, available homes for rent. Many ELI households are severely cost burdened, spending more than half of their income on housing.

Food Scarcity

Extremely low income households that are severely cost burdened spend more than half of their income on housing, which means they are less likely to make healthy food choices. Food Bank for Monterey County reports that 1 in 4 residents is hungry, with 34% of residents and 66% of farmworkers are food insecure. The Imperial Valley Food Bank reports distribution to over 25,000 people monthly across 30 locations. 1 in 5 seniors in Imperial County live below the poverty line, and 1 in 3 children are food insecure.

Low Levels of Educational Attainment

According to the California Findings from the National Agricultural Workers Survey (NAWS) 2015-2019, the average level of formal education completed by California farmworkers was eighth grade. Data collected from the California Department of Education showed lower rates of graduation amongst Black, Indigenous, People of Color (BIPOC) with Hispanic/Latinos graduation rates reported as 80.5% for 2020-21, a -1.6 percentage point variance from the previous year (82.1% in 2019-20).

Immigration Status/Fear of Deportation

Farmworker individuals and families with unauthorized status are less likely to advocate for their rights or seek resources for fear of retaliation or deportation. Dr. Lopez with the Center for Farmworker Families as well as Lupe Quintero with California Rural Legal Association report stolen wages as a repetitive issue amongst unauthorized workers.

High Rates of Unemployment

Data collected from the California Employment Development Department revealed high unemployment rates across CET service areas. The state unemployment rate as of March 2023 (not seasonally adjusted) is 4.8 percent, whereas Imperial County is at 15.6%, Monterey is at 9.6%, Santa Cruz is at 6.9% and San Benito is at 6.7%. Further analysis of the data revealed communities experiencing substantially higher rates of unemployment where CET participants live as well as where CET centers are located: Watsonville 17% (Santa Cruz County), Calexico 22.4% and Calipatria 16.7% (Imperial County), Pajaro 29.2% and Soledad 16.6% (Monterey County), Coachella 8.1% and Mecca 11.2% (Riverside County), as well as

Santa Maria 8.5% (Santa Barbara County).

10. “Conditions of poverty” are the negative environmental, safety, health and/or economic conditions that may reduce investment or growth in communities where low-income individuals live. After review and analysis of the data, describe the conditions of poverty in your agency’s service area(s). (Organizational Standard 3.4)

Poor Housing Conditions

The California Findings from the National Agricultural Workers Survey (NAWS) 2015-2019 Overcrowded housing, 35% of California farmworkers lived in crowded dwellings defined as more than one person per room and unauthorized workers were twice as likely as authorized workers to live in crowded dwellings (47% and 23% respectively). Dr. Lopez with the Center for Farmworker Families as well as Lupe Quintero with the California Rural Legal Association reported farmworkers living in substandard housing, in deplorable conditions, sometimes operated by “slumlords.” Housing scarcity and the high cost of housing means families in unsafe housing conditions are left with few options.

According to the National Low Income Housing Coalition, severely cost burdened households in poverty are more likely to sacrifice necessities like healthy food and healthcare in order to pay the rent and are also more likely to face eviction.

Poor Nutrition

Health Issues/Unaffordability of Healthcare

Environmental Concerns: Exposure to pesticides and unsafe water

Higher Crime Rates

High Risk Working Conditions

11. Describe your agency’s approach or system for collecting, analyzing, and reporting customer satisfaction data to the governing board. (Organizational Standard 1.3)

CET conducts two Student Satisfaction Surveys each fiscal year, one in spring and one in fall. Each Center Director reviews data and provides a report which includes any identified issues, a corrective action plan addressing issues, as well as “kudos” for positive feedback which can be implemented as a best practice at other centers. Center Directors route the report to Corporate and Regional Directors. Regional Directors review center reports, then summarize results for the entire region in a narrative report which is submitted to Corporate. The CEO presents the results and findings to the Board of Directors.

Community Needs Assessment Results

CSBG Act Section 676(b)(11)

California Government Code Section 12747(a)

State Plan 14.1a

Table 1: Needs Table

Complete the table below. Insert row(s) if additional space is needed.

Needs Identified	Level	Agency Mission (Y/N)	Currently Addressing (Y/N)	Agency Priority (Y/N)
Housing				
Food				
Health Services				
Employment Services				
Education Services				
Financial Services				
Legal Services				
Support Services				

Needs Identified: List the needs identified in your most recent CNA.

Level: List the need level, i.e., community or family. Community Level: Does the issue impact the community, not just clients or potential clients of the agency? For example, a community level employment need is: There is a lack of good paying jobs in our community. Family Level: Does the need concern individuals/families who have identified things in their own life that are lacking? An example of a family level employment need would be: Individuals do not have good paying jobs.

Essential to Agency Mission: Indicate if the identified need aligns with your agency's mission.

Currently Addressing: Indicate if your agency is already addressing the identified need.

Agency Priority: Indicate if the identified need will be addressed either directly or indirectly.

Table 2: Priority Ranking Table

List all needs identified as an agency priority in Table 1. Insert row(s) if additional space is needed.

Agency Priorities	Description of programs, services, activities	Indicator(s) or Service(s) Category	Why is the need a priority?
1. Employment Services			
2. Education Services			
3. Health Services			
4. Support Services			
5. Financial Services			
6. Legal Services			

Agency Priorities: Rank your agency's planned programs, services and activities to address the needs identified in Table 1 as agency priorities.

Description of programs, services, activities: Briefly describe the program, services or activities that your agency will provide to address the need. Identify the number of clients to be served or the number of units offered, including timeframes for each.

Indicator/Service Category: List the indicator(s) (CNPI, FNPI) or service(s) (SRV) that will be reported in CSBG Annual Report.

Why is this need a priority: Provide a brief explanation about why this need has been identified as a priority. Connect the need with the data. (CSBG Act Section 676(b)(3)(A))

Part II: Community Action Plan

CSBG Act Section 676(b)(11)

California Government Code Sections 12745(e), 12747(a)

California Code of Regulations, Title 22, Division 11, Chapter 1, Sections 100651 and 100655

Vision and Mission Statement

1. Provide your agency's Vision Statement.

Center for Employment Training will be recognized as a leader in human development and workforce innovation that accelerates individuals' skills and builds pathways to economic independence.

2. Provide your agency's Mission Statement.

The Mission of Center for Employment Training, an economic and community development corporation is to promote human development and education by providing people with marketable skills training and supportive services that contribute to self-sufficiency.

Tripartite Board of Directors

CSBG Act Sections 676B(a) and (b); 676(b)(10)

California Code of Regulations, Title 22, Division 11, Chapter 1, Section 100605

1. Describe your agency's procedures under which a low-income individual, community organization, religious organization, or representative of low-income individuals that considers its organization or low-income individuals to be inadequately represented on your agency's board to petition for adequate representation. (CSBG Act Section 676(b)(10))

Throughout its 50-year history, CET has maintained a policy of inclusion of former CET students on its Board of Directors, most of whom represented the low-income community. CET, as per its established board by-laws and process, incorporates and adheres to a tri-partite structure with representatives from the public, private, and low-income sectors.

CET holds annual elections whereby 1/3 of seated directors come up for annual re-election, in addition to elections to fill vacancies. Candidates representing the low-income sector submit a short biography including brief written responses regarding why they are interested in serving on the Board as well as an example(s) of how they represent the low-income community. Those determined to be eligible for the Low Income Sector will move to a second step whereby the CET Student Council at the main campus in San Jose will consider the nomination. CET Student Council is educated on the role and structure of the Board, reviews nominations, and holds a majority vote, the outcome of which is reported to the Nominations and Board Development Committee. The final Low Income slate is then presented to the full Board.

Service Delivery System

CSBG Act Section 676(b)(3)(A)

State Plan 14.3

1. Describe your agency's service delivery system. Include a description of your client intake process or system and specify whether services are delivered via direct services or subcontractors, or a combination of both. (CSBG Act Section 676(b)(3)(A), State Plan 14.3)

CET's service delivery system consists of a comprehensive job training program following a holistic approach designed specifically to be individualized and adaptable in order to meet the needs of low income and disadvantaged populations. CET utilizes a Customer Relationship Management (CRM) tool in order to better connect the low income community with vital training services. The CRM allows each CET center to manage relationships with prospective students by capturing walk-in traffic as well as inbound calls and web inquiries. This creates a direct link between CET recruitment and admissions staff and all potential students. The CRM also allows CET to measure the efficacy of outreach efforts and measures conversion rates from lead to enrollment. Prior to enrollment all potential students meet with a recruiter or admissions advisor who will provide a tour of the Center along with detailed information on the program of interest including program schedule, duration, cost, and desired educational and employment outcomes. A Comprehensive Adult Student Assessment Systems (CASAS) test is conducted and if the student scores at or below 8th grade level in either reading or math they will be routed to receive Vocational English as Second Language (VESL) and/or basic skills and math tutoring to support academic achievement. VESL classes support students in obtaining reading comprehension skills with a specific focus on vocabulary within their chosen field of study/occupation. Upon enrolling into training, students meet one-on-one with their instructors to develop an Individual Employment Plan (IEP) aimed at identifying barriers to course completion and employability. Internal and community resources are provided to the student as appropriate to mitigate identified barriers. Instructors continue to meet with students on a monthly basis to discuss their IEP and ensure progress towards their employment goals. Additionally, each skill employs a Unit Team consisting of the technical instructors, center director, job developer and other support staff who work together to assess, evaluate and measure student progress on a weekly basis. The unit team approach promotes and encourages a coordination of services to collectively guide the student through their training program while addressing obstacles to employment such as lack of transportation, poor work habits, skill gaps, work attitudes, legal issues, personal challenges and lack of skill competencies required to obtain full time employment. CET believes that students' work habits, behavioral patterns, and communication skills often have as much impact on job success as does technical knowledge. In order to prepare students for the demands of the world of work, CET provides a Human Development component in all training programs. Students receive instruction in life skills, communication strategies, situations on the job, and informational sessions by professionals on topics such as general health, parenting, budgeting, etc. CET also utilizes Canvas, an online Learning Management System which allows for a blended -learning approach and enables instructors to deliver dynamic and engaging learning experiences to students. CET

policies center around the needs of the populations we serve to achieve the highest percentage of positive outcomes. Low income and disadvantaged populations tend to have difficulty in managing day to day issues that may arise. Obstacles such as lack of transportation, childcare, healthcare, mental health issues, substance abuse, domestic violence and housing instability can make it difficult to manage commitments to both family and training. CET understands this and for this reason our attendance policies afford participants a time frame of up to 150% of scheduled program hours to complete their training. Participants are also able to take up to three leaves of absence should something arise to prevent them from attending training for an extended period of time. Furthermore, if students withdraw from training they have the option to resume within 180 days of exit without incurring additional fees. These policies have been created to prioritize the needs of the student and provide the tools and resources necessary to complete training, become qualified for the career of their choice and enter the workforce. All services are delivered directly by CET.

2. Describe how the poverty data related to gender, age, and race/ethnicity referenced in Part I, Question 1 informs your service delivery and strategies in your service area?

CET understands that the low income population we serve comes with barriers to education and employment that extend above and beyond average. The poverty data related to gender, age, and race/ethnicity confirms that these populations are experiencing extreme poverty characterized by lower wages, higher rates of unemployment, housing insecurity, overcrowded housing, food scarcity and overall scarcity of basic needs as outlined in the causes and conditions section of the Community Needs Assessment. Therefore, CET understands that in order to ensure the success of individuals and families impacted by poverty, we need to meet them where they are at. This entails taking a holistic approach to each individual, and understanding their barriers at intake in order to cater the training and wraparound services to address their specific needs. CET's service delivery model is designed with the hardest to serve individual in mind. As mentioned in the previous section, each participant has an Individual Employment Plan (IEP) developed with their Instructor to mitigate barriers and follow up on progress in one-on-one monthly meetings. The Unit Team also meets on a weekly basis to discuss any issues/challenges that arise throughout training thereby guaranteeing effective communication towards implementing solutions. CET Corporate Directors and Regional Directors meet monthly to identify any issues or identify patterns and report on progress towards organizational goals or projects. CET's Fund Development Department seeks out and obtains funding in response to organizational needs. Furthermore, CET's policies and procedures are created and developed to ensure compliance with funding/accreditation regulations or standards while also incorporating the flexibility needed to effectively serve low-income participants and provide them with every opportunity to attain success throughout training, graduation, employment and retention. This begins with open enrollment so that participants may begin training when they are best equipped to do so, and continues through CET's attendance policy which allows participants up to 150% of scheduled hours to complete training. An understanding of the multiple barriers facing the low income population also influences CET's Leave of Absence policy which allows participants to take up to three leaves of absence with a total maximum of 90 days. Lastly, students that withdraw from training have up to 180 days from

their last date of attendance to return at no additional cost. As mentioned in the previous section, these policies have been created to prioritize the needs of the student and provide the tools and resources necessary to complete training, become qualified for the career of their choice and enter the workforce.

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Linkages and Funding Coordination

CSBG Act Sections 676(b)(1)(B) and (C); (3)(B), (C) and (D); 676(b)(4), (5), (6), and (9)

California Government Code Sections 12747, 12760

Organizational Standards 2.1, 2.4

State Plan 9.3a, 9.3b, 9.4b, 9.6, 9.7, 14.1b, 14.1c, 14.3d, 14.4

1. Describe how your agency coordinates funding with other providers in your service area. If there is a formalized coalition of social service providers in your service area, list the coalition(s) by name and methods used to coordinate services/funding. (CSBG Act Sections 676(b)(1)(C), 676(b)(3)(C); Organizational Standard 2.1; State Plan 14.1c, 9.6, 9.7)

The CET Community Services grant is predominantly matched with the Department of Labor grant under WIOA Section 167 (National Farmworker Jobs Program) to provide a broad range of employment training and support services to the program beneficiaries, migrant and seasonal farmworkers, and dependents thereof. CET Staff is constantly seeking additional funding to support student and program needs while ensuring funding is effectively utilized to meet an unmet need of the community and avoiding duplication of services.

As a recipient of various grants through La Cooperativa Campesina de California (LCC), CET provides tuition assistance to dislocated agricultural workers enrolling into training programs. LCC funding also provides temporary housing assistance to migrant and seasonal farmworkers in the form of payments for rent, utilities, security deposits, shut-off assistance, eviction prevention assistance, and emergency housing. Furthermore, La Cooperativa provides funds through the National Dislocated Worker Grant to place COVID and fire-impacted dislocated workers with San Bernardino, San Diego, Santa Clara, and Ventura counties into temporary jobs. Dislocated workers participate in sanitation, clean-up, and repair efforts resulting from the COVID Pandemic and 2020 wildfires. Likewise, La Cooperativa and CET continue to work together on many community projects, such as with the local Workforce Development Boards in Rapid Response to address agriculture-related lay-offs to meet the needs of dislocated workers. We also provide support by assisting farmworkers to navigate through the WIOA Wagner-Peyser Complaint System Awareness & Referral Program. A percentage of funding received from these initiatives will cover costs for CET recruiters who conduct outreach and education informing farmworkers and their families about services available to support and improve their self-sufficiency.

2. Provide information on any memorandums of understanding and/or service agreements your agency has with other entities regarding coordination of services/funding. (CSBG Act Section 676(b)(9), Organizational Standard 2.1; State Plan 14.1c, 9.6, 9.7)

As a mandated partner with Workforce Development Boards, CET has established MOUs with local boards across several counties within our service areas. The goal of these MOUs is to create and maintain integrated service delivery systems that join CET job training and employment services while leveraging community resources to their greatest efficiency, coordinating critical service including career & family counseling, housing, transportation, healthcare, crisis

intervention, childcare, legal assistance, and other services as needed. Furthermore, CET's Immigration & Citizenship Program (ICP) department has existing MOUs with Santa Clara County Office of Immigrant Relations to educate the community regarding naturalization, DACA, immigration benefits and Know Your Rights presentations. ICP is also partnering with Asian Law Alliance to increase voter registration and education.

CET has established a detailed work plan and Memorandum of Understanding (MOU) with California's State Monitor Advocate (SMA). The MOU describes our coordinated outreach and advocacy in support of migrant and seasonal farmworkers throughout CET services areas. The plan includes assurances to work closely with local Workforce Development Boards (WDB) and America's Job Centers ensuring that migrant and seasonal farmworkers (MSFW) participants have access to equitable employment services and that compliance with federal and state regulations are in place.

3. Describe how your agency ensures delivery of services to low-income individuals while avoiding duplication of services in the service area(s). (CSBG Act Section 676(b)(5), State Plan 9.3a, California Government Code 12760)

Through current agreements, CET will work in concert with the State Monitor Advocate (SMA) to coordinate continued implementation of the WIOA Wagner-Peyser Employment Service Complaint System, monitor MSFW outreach programs, and ensure MSFWs receive the full range of equitable employment services. Services will include access to job training programs, housing assistance, career counseling, and job placement assistance. Other coordinated efforts will include working closely with One-Stop Career Centers and local businesses to initiate employer internships, bring about awareness of current and available job orders, and employer benefits. CET will also advocate for employment related protections through current complaint processes for all clients and their dependents. The benefits of the partnerships and MOU agreements also include outreach and advocacy support, unemployment insurance benefits filing assistance, access to America's Job Center services, to encourage co-enrollment with workforce partners, awareness of wage/hours laws, and meeting worksite safety requirements. The partnership plan also strives to ensure equitable employment services so that MSFWs receive a qualitative and quantitative proportion of services equal to those of other job seekers. Our goal and commitment is to work closely with the State Monitor Advocate (SMA) and America's Job Centers, One-Stop Career Centers, community partners, and businesses to better serve MSFW participants and their dependents by removing barriers and providing greater access to employment services leading to positive economic outcomes.

4. Describe how your agency will leverage other funding sources and increase programmatic and/or organizational capacity. (California Government Code Section 12747)

CET continually explores opportunities to leverage funding in order to increase programmatic and organizational capacity and expand services to the low-income community. As mentioned above, CET receives funding from La Cooperativa Campesina de California (LCC) to provide job training

to dislocated agricultural workers. Dislocated agricultural workers entering CET training programs are often co-enrolled through LCC and the National Farmworker Jobs Program grant through Department of Labor. This co-enrollment allows CET to maximize these funding sources to serve as many participants as possible. In addition, LCC funding also provides temporary housing assistance to migrant and seasonal farmworkers through the 167 MSFW Temporary Housing Assistance Program which provides payments for rent, utilities, security deposits, shut-off assistance, eviction prevention assistance, and emergency housing. Furthermore, La Cooperativa provides funds through the National Dislocated Worker Grant, Rapid Response grant, and the WIOA Wagner-Peyser Complaint System Awareness & Referral Program. A percentage of funding received from these initiatives is leveraged to cover costs for staff salaries and fringe benefits, as well as operating expenses.

CET is also a recipient of Title IV funding through the Department of Education which allows us to offset tuition training program costs with the Pell grant. In addition, CET is a recipient of the Latino Nonprofit Digital Accelerator grant award through the Hispanic Federation which allows CET to allocate resources for an instructional designer to evaluate and update our current basic computer skills curriculum and improve our technical infrastructure through the purchase of Canvas (Instructure), Adobe Captivate, and Articulate 360 licenses. CET also leverages funding through the U.S. Department of Labor Women's Bureau for the Women in Apprenticeship and Nontraditional Occupations (WANTO) grant as well as the English Language Learner Navigation Program through Ventura County. WANTO will provide MSFW women entering into nontraditional skill training programs with additional resources to ensure their success such as supportive services, workshops and presentations, and a pathway towards apprenticeship and employment.

CET will continue to assess the needs of the low income community and target funding opportunities that will allow for further leveraging. CET is continually seeking to mitigate barriers to education, employment, and vital resources while avoiding duplication of services to ensure every individual has equitable access to success.

5. Describe your agency's contingency plan for potential funding reductions. (California Government Code Section 12747)

CSBG funding supports CET infrastructure; in the event of reduced funding CET will likely explore the option of reducing the number of staff, as well as implementing furloughs to reduce staff hours. Increasing enrollment goals with students receiving financial aid will also be a necessity in the event of such a reduction in CSBG funds. Additionally, CET will review other local, state and federal grants to determine possible contract amendments that justify reallocating portions of said funding to support previously funded administrative and program activity, while also seeking out new grant proposal opportunities from foundations. In so doing, CET will do everything within its means to ensure that a proper level of service is maintained to continue supporting the low-income community in obtaining skills training and employment services.

6. Describe how your agency documents the number of volunteers and hours mobilized to support your activities. (Organizational Standard 2.4)

CET's Human Resources Department (HR) is responsible for maintaining documents tracking the number of volunteers and hours mobilized. HR documents the number of volunteers and hours in accordance with the referring agencies system/protocol.

7. Describe how your agency will address the needs of youth in low-income communities through youth development programs and promote increased community coordination and collaboration in meeting the needs of youth. (CSBG Act Section 676(b)(1)(B), State Plan 14.1b)

CET will continue to address the needs of youth in low-income communities by informing them of the occupational skills training programs and financial aid streams available to them. For many at risk youth, pursuing 2-, or 4-, college degrees are not a viable option either due to lack of basic skills, language barriers, or because they feel the pressure to become a wage earner for their families. CET's training programs offer youth a roadmap to obtaining in-demand skills that will lead to self-sufficiency. Our CET program model is designed to address the barriers and needs of each individual. Instructors meet with students upon enrollment to develop their Individual Employment Plan (IEP) that identifies barriers so that solutions can be implemented. Instructors meet with each individual on a monthly basis to track progress. Centers also utilize a Unit Team system which is comprised of the Center Director, Instructor, and support staff and are held weekly for each skill to discuss any issues. These systems help with developing personalized solutions that contribute to youth retention.

8. Describe how your agency will promote increased community coordination and collaboration in meeting the needs of youth, and support development and expansion of innovative community-based youth development programs such as the establishment of violence-free zones, youth mediation, youth mentoring, life skills training, job creation, entrepreneurship programs, after after-school childcare. (CSBG Act Section 676(b)(1)(B), State Plan 14.1b)

9. Describe the coordination of employment and training activities as defined in Section 3 of the Workforce and Innovation and Opportunity Act [29 U.S.C. 3102]. (CSBG Act Section 676(b)(5); State Plan 9.4b)

CET is a National Farmworkers Jobs Program grantee, and as such, a mandated partner of the local WIOA boards. We maintain Memorandums of Understanding with local AJCCs in each of our service delivery areas. We collaborate with AJCC staff to co-locate services, carry out recruitment and orientation, promote cross-training of staff and cross-referrals of participants. Our collaboration is also evident with our WIOA Wagner-Peyser Complaint System Awareness Grant. The funds from this grant are used to provide outreach communication strategies to extend the reach and

awareness and referral to the WIOA – Wagner Peyser Employment Services Complaint System. Another example of our continued collaboration is with the Rapid Response Grant, by which our activities focus on dislocated agricultural industry workers and are consistent with EDD Directive Rapid Response and Layoff Aversion.

10. Describe how your agency will provide emergency supplies and services, nutritious foods, and related services, as may be necessary, to counteract conditions of starvation and malnutrition among low-income individuals. (CSBG Act Section 676(b)(4), State Plan 14.4)

Located in a low-income residential neighborhood, the CET facility in San Jose can potentially become a fully operational emergency shelter in the event of a disaster or emergency. As a Collaborating Agencies' Disaster Relief Effort (CADRE) member and with established partnerships with American Red Cross and Second Harvest Food Banks, CET will be able to provide shelter and food to over 3,000 people on a short-term basis during an emergency disaster. Additionally, over 35 CET employees have been trained and certified by the City's San Jose Prepared! Program to be volunteer emergency disaster responders for our organization and the community.

As for non-disaster emergency related assistance, CET has long established working relationships with food banks, congregate feeding programs, church based providers of emergency food and vouchers to help low-income individuals counteract conditions of hunger and malnutrition. CET coordinates with these agencies on an on-going basis for monthly distribution of food at CET sites or at the agencies and organizations that offer such services. As necessary, CET provides transportation and bus passes for low-income individuals to access these services.

11. Describe how your agency coordinates with other antipoverty programs in your area, including the emergency energy crisis intervention programs under Title XXVI, relating to low-income home energy assistance (LIHEAP) that are conducted in the community. (CSBG Act Section 676(b)(6))

In CET's California service area, covering nineteen different counties, we have partnerships with local WIB/American Job Centers and local Community Action Agencies. The MOUs with these agencies ensure that the duplication of services is avoided in order to produce a synchronized delivery strategy that will benefit low-income communities in each county. In addition to this coordinated effort, fifteen of these partners are Energy Service Providers contracted with CSD to provide services for the low-income Home Energy Assistance Program (LIHEAP) and Weatherization Assistance Program (WAP).

12. Describe how your agency coordinates services with your local LIHEAP service provider?

CET leverages CSBG, National Farmworker Jobs Program (NFJP), and La Cooperativa 167 MSFW Temporary Housing Assistance Program funds to aid participants with emergency housing, utility, and shut-off assistance. CET staff have established relationships with local utility service providers to refer participants to receive additional information and resources through LIHEAP.

13. Describe how your agency will use funds to support innovative community and neighborhood-based initiatives, which may include fatherhood and other initiatives, with the goal of strengthening families and encouraging effective parenting. (CSBG Act Section 676(b)(3)(D), State Plan 14.3d)

CET combines job training with human development offering a host of life skills services and educational session. Topics may include making better use of income, dealing with substance abuse, domestic violence issues, purchasing a home, financial literacy, stress management, family planning, and parenting among other topics. CET collaborates with other community-based organizations to bring in speakers and offer presentations to the student body.

CET is dedicated to promoting diversity, equity and inclusion (DEI) throughout all aspects of day to day activities. As such, staff receive DEI training and workshops to help raise awareness of how stereotypes or ideologies are perpetuated as well as unconscious bias to aid in heightened mindfulness in all situations. This practice allows for normalizing different gender identities, gender roles in both professional and personal environments, and creates safe spaces where all are welcome, valued, and heard.

14. Describe how your agency will develop linkages to fill identified gaps in the services, through the provision of information, referrals, case management, and follow-up consultations. (CSBG Act Section 676(b)(3)(B), State Plan 9.3b)

CET will continue to coordinate in-house services with partner referrals to address the many needs of the low income population. Case management is ongoing beginning at intake, through enrollment, training completion, placement and follow-up. By utilizing the Unit Team, CET is able to track and monitor needs in order to match participants with local community services offered through agencies and organizations. CET collaborates with partners to host or participate in community events and engage in outreach activities. Any identified gaps will be addressed through collaboration with partners to research solutions that match participants with services.

Monitoring

CSBG Act Section 678D(a)(1)(A) and (B)

1. Describe how your agency's monitoring activities are related to establishing and maintaining the integrity of the CSBG program. Include your process for maintaining high standards of program and fiscal performance.

CET conducts internal program and fiscal monitoring of its sites on a quarterly basis. With three different types of monitoring (Compliance, Plan vs. Actual, Program Quality Review) and a clearly defined monitoring guide, CET is able to:

- Ensure that the requirements of specified contracts are met
- Assess progress towards goals and objectives and to identify existing or emerging problems
- Review the excellence and effectiveness of services to participants

The CET internal audit team is responsible for monitoring all program activities, services, program, administration, and management practices supported with organization funds to ensure legal, fiscal, administrative, and programmatic compliance.

2. If your agency utilizes subcontractors, please describe your process for monitoring the subcontractors. Include the frequency, type of monitoring, i.e., onsite, desk review, or both, follow-up on corrective action, and issuance of formal monitoring reports.

CET grantor La Cooperativa Campesina de California requires utilizing subcontractors to meet contract deliverables for the NDWG Temporary Jobs contract. In such cases, CET has a monitoring tool used to guide on-site reviews of the temporary worksites. The on-site reviews occur every 6 months or more often if needed. The review includes:

- Review pay records (time cards/sheets) and attendance reports to ensure controls are established for preventing unauthorized payments.
- Interview participants to determine if Temporary Worksite needs meet guidelines approved by Center for Employment Training
- Review health, safety, and staffing levels to determine if worksite is capable to fulfill Temporary Worksite obligations.

A written report is submitted to Center for Employment Training Administration. If there are findings in the report that cannot be resolved timely, a draft transmittal letter and/or the report will be issued to the Temporary Worksite within 30 days of the exit conference. When corrective action is recommended to resolve a finding or address a concern, a letter will be issued to the Temporary Worksite and provide fifteen (15) working days from issuance for response. Resolution of corrective action shall be sought until all issues are concluded. If during the monitoring process the monitor suspects that he/she has discovered possible fraud/abuse, monitoring of the Temporary Worksite will be terminated and findings reported immediately to the

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Data Analysis, Evaluation, and ROMA Application

CSBG Act Section 676(b)(12)

Organizational Standards 4.2, 4.3

1. Describe your agency's method for evaluating the effectiveness of programs and services. Include information about the types of measurement tools, the data sources and collection procedures, and the frequency of data collection and reporting. (Organizational Standard 4.3)

CET's Corporate Contracts, Planning & MIS Department, Operations, Financial Aid and Fiscal Departments are involved in monitoring program operations to ensure accuracy of data, quality of services, progress toward performance outcomes, and contract compliance. CET's computerized Management Information System (MIS) generates a variety of reports which are used by local, regional, and corporate directors to monitor enrollments, attendance, completion of competencies, graduation, placement, job retention and wage gain. The MIS system also produces standard reports on trainee absenteeism, idle rates and average training times by skill, as well as client characteristics. Also incorporated into the MIS system to track student progress and outcomes are the Individual Employment Plan (IEP), competency attainment forms and counseling/case management and monthly progress notes. Additionally, various internal reports are generated and distributed to staff on a frequent basis. These reports are organized in an intuitive manner and give key stakeholders insight to various areas of strengths and weakness. For example, enrollment reports are analyzed by Center Directors and Corporate Directors on a daily basis to track performance on outreach and recruitment efforts. The Program Diagnostic Report displays over 20 performance standards where problematic areas are flagged, trends are analyzed, and corrective action plans are required for centers who do not meet key benchmarks. Ultimately, management accountability within CET is measured by the following standards: enrollments, attendance, training-related placement rates, graduation rates, and job retention rates. Job retention rates in training-related fields are recognized by management as a good indicator of the quality of training services provided and the labor market demand for that skill.

Reports are generated and distributed to key stakeholders at various intervals as described below:

Frequency	Report	Purpose
Daily	Enrollment Report	Track enrollment progress, early withdrawal rates, and cancellations by center
Weekly	Attendance Tracker	Track attendance and academic progress of each

			individual student
	Monthly/Annual	Accreditation Reports	Track graduation and training-related placement rates based on cohorts specific to accrediting agencies and governing bodies
	Monthly	Program Diagnostic Report	Assess centers, programs, and classes at the macro and micro level based on key performance metrics in order to identify weaknesses and strengths for corrective action or promising approaches
	Quarterly	DOL Reports	Report enrollments, placements, graduates, exits, and employment retention
	Annual	CSD Annual Reports	Report demographics, national performance indicators, and services

2. Applying the Results Oriented Management and Accountability (ROMA) cycle of assessment, planning, implementation, achievement of results, and evaluation, describe one change your agency made to improve low-income individuals' and families' capacity for self-sufficiency. (CSBG Act Section 676(b)(12), Organizational Standard 4.2)

Response in progress.

3. Applying the full ROMA cycle, describe one change your agency facilitated to help revitalize the low-income communities in your agency's service area(s). (CSBG Act Section 676(b)(12), Organizational Standard 4.2)

Response in progress.

Response and Community Awareness

Diversity, Equity, and Inclusion

1. Does your agency have Diversity, Equity, and Inclusion (DEI) programs in place that promote the representation and participation of different groups of individuals, including people of different ages, races and ethnicities, abilities and disabilities, genders, religions, cultures, and sexual orientations?

☒ Yes

☐ No

2. If yes, please describe.

CET is dedicated to promoting diversity, equity and inclusion (DEI) throughout all aspects of service delivery and day to day activities. As such, staff receive DEI training and workshops to help raise awareness of how stereotypes or ideologies are perpetuated as well as unconscious bias to aid in heightened mindfulness in all situations. This practice allows for normalizing different gender identities, gender roles in both professional and personal environments, and creates safe spaces where all are welcome, valued, and heard. DEI is also a component of staff on boarding for new hires, in addition to staff professional development.

In addition to staff training, staff at every level of the organization model DEI principles in setting the stage for workplace conduct. CET Instructors simulate real-life work environments to prepare participants to enter the labor force. In line with CET's mission to promote human development, staff are dedicated to integrating DEI in classroom and lab environments. CET invites speakers onsite to make presentations and facilitate workshops, while also sharing other multimedia resources including videos, or online DEI workshops/training.

3. Does your agency have Diversity, Equity and Inclusion (DEI) policies in place that promote the representation and participation of different groups of individuals, including people of different ages, races and ethnicities, abilities and disabilities, genders, religions, cultures and sexual orientations?

☒ Yes

☐ No

4. If yes, please describe.

Staff hiring practices and onboarding include CET's Equal Employment Opportunity (EEO) policy that reflects DEI. The EEO policy states the following:

CET will consider and hire qualified applicants without discrimination. CET maintains as its staffing goal to recruit and maintain a workforce that reflects the diversity of the CET community.

CET is an Equal Employment Opportunity employer and it is the policy of CET to ensure non-discrimination in its employment practices, including but not limited to, sexual (any unwelcome behavior of a sexual nature); or non-sexual harassment (any unwelcome conduct, verbal, written or physical); recruitment, hiring, promotion, demotion, training, compensation, transfer, discipline or termination of any applicant or employee on the basis of race, ethnic group identification, age, sex, religion, ancestry, political affiliation or belief, transgender status, gender identity, sexual orientation, national origin, including Limited English Proficiency (LEP), citizenship status, Family and Medical Leave, medical condition, pregnancy, physical or mental disability, reasonable accommodation, genetic information, marital status, veteran/military status, or any other protected groups, retaliation for participation in protected EEO activity, retaliation or any other basis protected by federal, state, or local law, ordinance or regulation. Employment related decisions must be made on merit, and not on discriminatory factors.

Disaster Preparedness

1. Does your agency have a disaster plan in place that includes strategies on how to remain operational and continue providing services to low-income individuals and families during and following a disaster? The term disaster is used in broad terms including, but not limited to, a natural disaster, pandemic, etc.

☒ Yes

☐ No

2. If yes, when was the disaster plan last updated?

3. Briefly describe your agency's main strategies to remain operational during and after a disaster.

Located in a low-income residential neighborhood, the CET facility in San Jose can potentially become a fully operational emergency shelter in the event of a disaster or emergency. As a Collaborating Agencies' Disaster Relief Effort (CADRE) member and with established partnerships with American Red Cross and Second Harvest Food Banks, CET will be able to provide shelter and food to over 300 people from the immediate neighborhood on a short-term basis during an emergency disaster. Additionally, CET would reach out to CADRE for volunteer emergency disaster responders to provide support to our organization and the community and for community resources like the Food Bank, Red Cross, and local churches.

Federal CSBG Programmatic Assurances and Certification

CSBG Act 676(b)

Use of CSBG Funds Supporting Local Activities

676(b)(1)(A): The state will assure “that funds made available through grant or allotment will be used – (A) to support activities that are designed to assist low-income families and individuals, including families and individuals receiving assistance under title IV of the Social Security Act, homeless families and individuals, migrant or seasonal farmworkers, and elderly low-income individuals and families, and a description of how such activities will enable the families and individuals--

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

Needs of Youth

676(b)(1)(B) The state will assure “that funds made available through grant or allotment will be used – (B) to address the needs of youth in low-income communities through youth development programs that support the primary role of the family, give priority to the prevention of youth problems and crime, and promote increased community coordination and collaboration in meeting the needs of youth, and support development and expansion of innovative community-based youth development programs that have demonstrated success in preventing or reducing youth crime, such as--

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

Coordination of Other Programs

676(b)(1)(C) The state will assure “that funds made available through grant or allotment will be used – (C) to make more effective use of, and to coordinate with, other programs related to the purposes of this subtitle (including state welfare reform efforts)

Eligible Entity Service Delivery System

676(b)(3)(A) Eligible entities will describe “the service delivery system, for services provided or coordinated with funds made available through grants made under 675C(a), targeted to low-income individuals and families in communities within the state;

Eligible Entity Linkages – Approach to Filling Service Gaps

676(b)(3)(B) Eligible entities will describe “how linkages will be developed to fill identified gaps in the services, through the provision of information, referrals, case management, and follow-up consultations.”

Coordination of Eligible Entity Allocation 90 Percent Funds with Public/Private Resources

676(b)(3)(C) Eligible entities will describe how funds made available through grants made under 675C(a) will be coordinated with other public and private resources.”

Eligible Entity Innovative Community and Neighborhood Initiatives, Including Fatherhood/Parental Responsibility

676(b)(3)(D) Eligible entities will describe “how the local entity will use the funds [made available under 675C(a)] to support innovative community and neighborhood-based initiatives related to the purposes of this subtitle, which may include fatherhood initiatives and other initiatives with the goal of strengthening families and encouraging parenting.”

Eligible Entity Emergency Food and Nutrition Services

676(b)(4) An assurance “that eligible entities in the state will provide, on an emergency basis, for the provision of such supplies and services, nutritious foods, and related services, as may be necessary to counteract conditions of starvation and malnutrition among low-income individuals.”

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

676(b)(5) An assurance “that the State and eligible entities in the State will coordinate, and establish linkages between, governmental and other social services programs to assure the effective delivery of such services, and [describe] how the State and the eligible entities will coordinate the provision of employment and training activities, as defined in section 3 of the Workforce Innovation and Opportunity Act, in the State and in communities with entities providing activities through statewide and local workforce development systems under such Act.”

State Coordination/Linkages and Low-income Home Energy Assistance

676(b)(6) “[A]n assurance that the State will ensure coordination between antipoverty programs in each community in the State, and ensure, where appropriate, that emergency energy crisis intervention programs under title XXVI (relating to low-income home energy assistance) are conducted in such community.”

Community Organizations

676(b)(9) An assurance “that the State and eligible entities in the state will, to the maximum extent possible, coordinate programs with and form partnerships with other organizations serving low-income residents of the communities and members of the groups served by the State, including religious organizations, charitable groups, and community organizations.”

Eligible Entity Tripartite Board Representation

676(b)(10) “[T]he State will require each eligible entity in the State to establish procedures under which a low-income individual, community organization, or religious organization, or representative of low-income individuals that considers its organization, or low-income individuals, to be inadequately represented on the board (or other mechanism) of the eligible entity to petition for adequate representation.”

Eligible Entity Community Action Plans and Community Needs Assessments

676(b)(11) “[A]n assurance that the State will secure from each eligible entity in the State, as a condition to receipt of funding by the entity through a community service block grant made under this subtitle for a program, a community action plan (which shall be submitted to the Secretary, at the request of the Secretary, with the State Plan) that includes a community needs assessment for the community serviced, which may be coordinated with the community needs assessment conducted for other programs.”

State and Eligible Entity Performance Measurement: ROMA or Alternate System

676(b)(12) “[A]n assurance that the State and all eligible entities in the State will, not later than fiscal year 2001, participate in the Results Oriented Management and Accountability System, another performance measure system for which the Secretary facilitated development pursuant to section 678E(b), or an alternative system for measuring performance and results that meets the requirements of that section, and [describe] outcome measures to be used to measure eligible entity performance in promoting self-sufficiency, family stability, and community revitalization.”

Fiscal Controls, Audits, and Withholding

678D(a)(1)(B) An assurance that cost and accounting standards of the Office of Management and Budget (OMB) are maintained.

- ☐ **By checking this box and signing the Cover Page and Certification, the agency’s Executive Director and Board Chair are certifying that the agency meets the assurances set out above.**

State Assurances and Certification

California Government Code Sections 12747(a), 12760, 12768

For CAA, MSFW, NAI, and LPA Agencies

[California Government Code § 12747\(a\)](#): Community action plans shall provide for the contingency of reduced federal funding.

[California Government Code § 12760](#): CSBG agencies funded under this article shall coordinate their plans and activities with other agencies funded under Articles 7 (commencing with Section 12765) and 8 (commencing with Section 12770) that serve any part of their communities, so that funds are not used to duplicate particular services to the same beneficiaries and plans and policies affecting all grantees under this chapter are shaped, to the extent possible, so as to be equitable and beneficial to all community agencies and the populations they serve.

- ☐ **By checking this box and signing the Cover Page and Certification, the agency's Executive Director and Board Chair are certifying the agency meets assurances set out above.**

For MSFW Agencies Only

[California Government Code § 12768](#): Migrant and Seasonal Farmworker (MSFW) entities funded by the department shall coordinate their plans and activities with other agencies funded by the department to avoid duplication of services and to maximize services for all eligible beneficiaries.

- ☐ **By checking this box and signing the Cover Page and Certification, the agency's Executive Director and Board Chair are certifying the agency meets assurances set out above.**

Organizational Standards

Category One: Consumer Input and Involvement

Standard 1.1 The organization/department demonstrates low-income individuals' participation in its activities.

Standard 1.2 The organization/department analyzes information collected directly from low-income individuals as part of the community assessment.

Standard 1.3 (Private) The organization has a systematic approach for collecting, analyzing, and reporting customer satisfaction data to the governing board.

Standard 1.3 (Public) The department has a systematic approach for collecting, analyzing, and reporting customer satisfaction data to the tripartite board/advisory body, which may be met through broader local government processes.

Category Two: Community Engagement

Standard 2.1 The organization/department has documented or demonstrated partnerships across the community, for specifically identified purposes; partnerships include other anti-poverty organizations in the area.

Standard 2.2 The organization/department utilizes information gathered from key sectors of the community in assessing needs and resources, during the community assessment process or other times. These sectors would include at minimum: community-based organizations, faith-based organizations, private sector, public sector, and educational institutions.

Standard 2.4 The organization/department documents the number of volunteers and hours mobilized in support of its activities.

Category Three: Community Assessment

Standard 3.1 (Private) Organization conducted a community assessment and issued a report within the past 3 years.

Standard 3.1 (Public) The department conducted or was engaged in a community assessment and issued a report within the past 3-year period, if no other report exists.

Standard 3.2 As part of the community assessment, the organization/department collects and includes current data specific to poverty and its prevalence related to gender, age, and race/ethnicity for their service area(s).

Standard 3.3 The organization/department collects and analyzes both qualitative and quantitative data on its geographic service area(s) in the community assessment.

Standard 3.4 The community assessment includes key findings on the causes and conditions of poverty and the needs of the communities assessed.

Standard 3.5 The governing board or tripartite board/advisory body formally accepts the completed community assessment.

Category Four: Organizational Leadership

Standard 4.1 (Private) The governing board has reviewed the organization's mission statement within the past 5 years and assured that:

1. The mission addresses poverty; and
2. The organization's programs and services are in alignment with the mission.

Standard 4.1 (Public) The tripartite board/advisory body has reviewed the department's mission statement within the past 5 years and assured that:

1. The mission addresses poverty; and
2. The CSBG programs and services are in alignment with the mission.

Standard 4.2 The organization's/department's Community Action Plan is outcome-based, anti-poverty focused, and ties directly to the community assessment.

Standard 4.3 The organization's/department's Community Action Plan and strategic plan document the continuous use of the full Results Oriented Management and Accountability (ROMA) cycle or comparable system (assessment, planning, implementation, achievement of results, and evaluation). In addition, the organization documents having used the services of a ROMA-certified trainer (or equivalent) to assist in implementation.

Appendices

Please complete the table below by entering the title of the document and its assigned appendix letter. Agencies must provide a copy of the Notice(s) of Public Hearing and the Low-Income Testimony and the Agency's Response document as appendices A and B, respectively. Other appendices such as the community need assessment, surveys, maps, graphs, executive summaries, analytical summaries are encouraged. All appendices should be labeled as an appendix (e.g., Appendix A: Copy of the Notice of Public Hearing) and submitted with the CAP.

Document Title	Appendix Location
Copy of the Notice(s) of Public Hearing	A
Low-Income Testimony and Agency's Response	B