

STANDARDS



CENTER OF EXCELLENCE DEVELOPED CSBG ORGANIZATIONAL STANDARDS

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Introduction

In 2012, the Federal Office of Community Services (OCS) provided funding to establish the CSBG Organizational Standards Center of Excellence (COE). The COE was charged with developing a set of organizational standards designed to ensure that CSBG Eligible Entities (CEEs) have the capacity to provide high-quality services to low-income families and communities. The Community Action Partnership received this funding and engaged and expanded the existing CSBG Working Group to spearhead these efforts. The Partnership and the CSBG Working Group involved the breadth of CSBG Network including CSBG Eligible Entities/Community Action Agencies, CSBG State Lead Agencies/Offices, Community Action State Associations, National CSBG Partners (CAPLAW, NASCSP, NCAF), content experts, and others to develop this comprehensive set of CSBG organizational standards.

The initial effort included an intensive 9-month process of listening sessions, literature reviews, surveys, and field testing that resulted in a draft of the CSBG organizational standards being provided to OCS in July 2013. Readers of this document are encouraged to access the July 2013 submission to review the project's full background, standards development process, and implementation recommendations. In March 2014, OCS published a draft information memorandum (IM) including the proposed organizational standards, providing potential implementation recommendations and seeking additional input from the Network.

In January 2015, OCS released [IM 138, State Establishment of Organizational Standards for CSBG Eligible Entities under 678B of the CSBG Act, 42.U.S.C § 9914](#). IM 138 provides direction to States, the District of Columbia, U.S. Territories, and CEEs on establishing organizational standards by FY 2016 and includes the final wording of the standards developed by the Organizational Standards COE.

The Standards were developed in three thematic groups, comprising nine categories with the final set including 58 Standards for private/nonprofit CEEs and 50 for public/governmental entity CEEs. These categories include:

Maximum Feasible Participation

- Consumer Input and Involvement
- Community Engagement
- Community Assessment

Vision and Direction

- Organizational Leadership
- Board Governance
- Strategic Planning

Operations and Accountability

- Human Resource Management
- Financial Operations and Oversight
- Data and Analysis

The COE-developed organizational standards work together to characterize an effective and healthy organization. Some of the Standards have direct links to the CSBG Act, such as the standards on the tripartite board structure and the democratic selection process. Some Standards link with U.S. Office of Management and Budget (OMB) guidance, such as the standards on audits. As a whole, the standards reflect many of the requirements of the CSBG Act, applicable Federal laws and regulations, good management practices, and the values of Community Action.

This document provides the final language for the final COE-developed organizational standards. Additional resources can be found on the Partnership’s website at www.communityactionpartnership.com and include Assessment Tools and a Glossary of Terms. These resources are designed to assist CEEs and States with assessing CEEs against the organizational standards, provide clarity as to terms and activities, and offer non-binding guidance as to the intent of individual standards and how to demonstrate meeting them.

This document and other tools referenced are the work of the Organizational Standards Center of Excellence and the Community Action Partnership. Readers are encouraged to refer to IM 138 for OCS-guidance regarding the CSBG Organizational standards.

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For the purposes of this document, the following definitions apply:

Private CSBG-Eligible Entity - Nonprofit 501(c) (3) organizations serving local communities that are eligible to receive Community Services Block Grant funding. These nonprofit entities are governed by a tripartite board of directors, run operationally by an Executive Director or CEO, and may receive funding from a variety of public and private sources.

Public CSBG-Eligible Entity - Units of local governmental entities, such as a county or city government, eligible to receive Community Services Block Grant funding. Many “Public CEEs” operate programs directly out of the government/municipal department while others subcontract to nonprofits in their communities to provide services. They are advised by a tripartite board/advisory body.

This publication was created by National Association of Community Action Agencies – Community Action Partnership in the performance of the U.S. Department of Human Services, Administration for Children and Families, Office of Community Services Grant Number 90ET0445. Any opinion, findings, and conclusions, or recommendations expressed in this material are those of the authors and do not necessarily reflect the views of the U.S. Department of Health and Human Services, Administration for Children and Families.

Organizational Standards For Private, Nonprofit CSBG Eligible Entities

MAXIMUM FEASIBLE PARTICIPATION

CATEGORY ONE: Consumer Input and Involvement

Community Action is rooted in the belief that people with low incomes are in the best position to express what they need to make a difference in their lives. CSBG eligible entities work in partnership with the people and communities they serve. Community Action works in a coordinated and comprehensive manner to develop programs and services that will make a critical difference in the lives of participants. Individuals and families are well attuned to what they need, and when Community Action taps into that knowledge, it informs our ability to implement high-impact programs and services.

Research shows that through engagement in community activities such as board governance, peer to peer leadership, advisory bodies, volunteering, and other participatory means, the poor build personal networks and increase their social capital so that they are able to move themselves and their families out of poverty. Community Action is grounded in helping families and communities build this social capital for movement to self-sufficiency.

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

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

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

CATEGORY TWO: Community Engagement

No CSBG eligible entity can meet all of a community's needs independently. Through formal and informal partnerships, ongoing community planning, advocacy, and engagement of people with low incomes, partners ranging from community and faith-based organizations, educational institutions, government, and business work together with Community Action Agencies and other CSBG eligible entities to successfully move families out of poverty and revitalize communities.

Community Action is often the backbone organization of community efforts to address poverty and community revitalization: leveraging funds, convening key partners, adding the voice of the underrepresented, and being the central coordinator of efforts. It is not an easy role to play, but a vital one for families and communities.

- Standard 2.1** **The organization 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 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 2.3** **The organization communicates its activities and its results to the community.**
- Standard 2.4** **The organization documents the number of volunteers and hours mobilized in support of its activities.**

CATEGORY THREE: Community Assessment

Local control of Federal CSBG resources is predicated on regular comprehensive community assessments that take into account the breadth of community needs as well as the partners and resources available in a community to meet these needs. Regular assessment of needs and resources at the community level is the foundation of Community Action and a vital management and leadership tool that is used across the organization and utilized by the community to set the course for both CSBG and all agency resources.

- Standard 3.1** **The organization conducted a community assessment and issued a report within the past 3 years.**

- Standard 3.2** **As part of the community assessment, the organization 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 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 formally accepts the completed community assessment.**

VISION AND DIRECTION

CATEGORY FOUR: Organizational Leadership

Community Action leadership is exemplified at all levels across the organization and starts with a mission that clarifies Community Action's work on poverty. A well-functioning board, and a focused chief executive officer (CEO)/executive director, well-trained and dedicated staff, and volunteers giving of themselves to help others will establish Community Action as the cornerstone and leverage point to address poverty across the community. Ensuring strong leadership both for today and into the future is critical.

This category addresses the foundational elements of mission as well as the implementation of the Network's model of good performance management (ROMA). It ensures CAAs have taken steps to plan thoughtfully for today's work and tomorrow's leadership.

- Standard 4.1** 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 4.2** The organization's Community Action plan is outcome-based, anti-poverty focused, and ties directly to the community assessment.
- Standard 4.3** The organization'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.
- Standard 4.4** The governing board receives an annual update on the success of specific strategies included in the Community Action plan.
- Standard 4.5** The organization has a written succession plan in place for the CEO/ED, approved by the governing board, which contains procedures for covering an emergency/unplanned, short-term absence of 3 months or less, as well as outlines the process for filling a permanent vacancy.
- Standard 4.6** An organization-wide, comprehensive risk assessment has been completed within the past 2 years and reported to the governing board.

CATEGORY FIVE: Board Governance

Community Action boards are uniquely structured to ensure maximum feasible participation by the entire community, including those the network serves. By law, Community Action boards are comprised of at least 1/3 low-income consumers (or their representatives), 1/3 elected officials (or their appointees), and the remainder private-sector community members. To make this structure work as intended, CAAs must recruit board members thoughtfully, work within communities to promote opportunities for board service, and orient, train, and support them in their oversight role. Boards are foundational to good organizational performance and the time invested to keep them healthy and active is significant, but necessary.

- Standard 5.1** **The organization’s governing board is structured in compliance with the CSBG Act:**
- 1. At least one third democratically-selected representatives of the low-income community;**
 - 2. One-third local elected officials (or their representatives); and**
 - 3. The remaining membership from major groups and interests in the community.**
- Standard 5.2** **The organization’s governing board has written procedures that document a democratic selection process for low-income board members adequate to assure that they are representative of the low-income community.**
- Standard 5.3** **The organization’s bylaws have been reviewed by an attorney within the past 5 years.**
- Standard 5.4** **The organization documents that each governing board member has received a copy of the bylaws within the past 2 years.**
- Standard 5.5** **The organization’s governing board meets in accordance with the frequency and quorum requirements and fills board vacancies as set out in its bylaws.**
- Standard 5.6** **Each governing board member has signed a conflict of interest policy within the past 2 years.**
- Standard 5.7** **The organization has a process to provide a structured orientation for governing board members within 6 months of being seated.**
- Standard 5.8** **Governing board members have been provided with training on their duties and responsibilities within the past 2 years.**
- Standard 5.9** **The organization’s governing board receives programmatic reports at each regular board meeting.**

CATEGORY SIX: Strategic Planning

Establishing the vision for a Community Action Agency is a big task and setting the course to reach it through strategic planning is serious business. CSBG eligible entities take on this task by looking both at internal functioning and at the community's needs. An efficient organization knows where it is headed, how the board and staff fit into that future, and how it will measure its success in achieving what it has set out to do. This agency-wide process is board-led and ongoing. A "living, breathing" strategic plan with measurable outcomes is the goal, rather than a plan that gets written but sits on a shelf and stagnates. Often set with an ambitious vision, strategic plans set the tone for the staff and board and are a key leadership and management tool for the organization.

- Standard 6.1** **The organization has an agency-wide strategic plan in place that has been approved by the governing board within the past 5 years.**

- Standard 6.2** **The approved strategic plan addresses reduction of poverty, revitalization of low-income communities, and/or empowerment of people with low incomes to become more self-sufficient.**

- Standard 6.3** **The approved strategic plan contains family, agency, and/or community goals.**

- Standard 6.4** **Customer satisfaction data and customer input, collected as part of the community assessment, is included in the strategic planning process.**

- Standard 6.5** **The governing board has received an update(s) on progress meeting the goals of the strategic plan within the past 12 months.**

OPERATIONS AND ACCOUNTABILITY

CATEGORY SEVEN: Human Resource Management

The human element of Community Action's work is evident at all levels of the organization and the relationship an organization has with its staff often reflects the organization's values and mission. Oversight of the chief executive officer (CEO)/executive director and maintaining a strong human resources infrastructure are key responsibilities of board oversight. Attention to organizational elements such as policies and procedures, performance appraisals, and training lead to strong organizations with the capacity to deliver high quality services in low-income communities.

- Standard 7.1** **The organization has written personnel policies that have been reviewed by an attorney and approved by the governing board within the past 5 years.**
- Standard 7.2** **The organization makes available the employee handbook (or personnel policies in cases without a handbook) to all staff and notifies staff of any changes.**
- Standard 7.3** **The organization has written job descriptions for all positions, which have been updated within the past 5 years.**
- Standard 7.4** **The governing board conducts a performance appraisal of the CEO/executive director within each calendar year.**
- Standard 7.5** **The governing board reviews and approves CEO/executive director compensation within every calendar year.**
- Standard 7.6** **The organization has a policy in place for regular written evaluation of employees by their supervisors.**
- Standard 7.7** **The organization has a whistleblower policy that has been approved by the governing board.**
- Standard 7.8** **All staff participate in a new employee orientation within 60 days of hire.**
- Standard 7.9** **The organization conducts or makes available staff development/training (including ROMA) on an ongoing basis.**

CATEGORY EIGHT: Financial Operations and Oversight

The fiscal bottom line of Community Action is not isolated from the mission, it is a joint consideration. Community Action boards and staff maintain a high level of fiscal accountability through audits, monitoring by State and Federal agencies, and compliance with Federal Office of Management Budget circulars. The management of Federal funds is taken seriously by CSBG eligible entities and the Standards specifically reflect the board's oversight role as well as the day-to-day operational functions.

- Standard 8.1** **The Organization's annual audit (or audited financial statements) is completed by a Certified Public Accountant on time in accordance with Title 2 of the Code of Federal Regulations, Uniform Administration Requirements, Cost Principles, and Audit Requirement (if applicable) and/or State audit threshold requirements.**
- Standard 8.2** **All findings from the prior year's annual audit have been assessed by the organization and addressed where the governing board has deemed it appropriate.**
- Standard 8.3** **The organization's auditor presents the audit to the governing board.**
- Standard 8.4** **The governing board formally receives and accepts the audit.**
- Standard 8.5** **The organization has solicited bids for its audit within the past 5 years.**
- Standard 8.6** **The IRS Form 990 is completed annually and made available to the governing board for review.**
- Standard 8.7** **The governing board receives financial reports at each regular meeting that include the following:**
1. Organization-wide report on revenue and expenditures that compares budget to actual, categorized by program; and
2. Balance sheet/statement of financial position.
- Standard 8.8** **All required filings and payments related to payroll withholdings are completed on time.**
- Standard 8.9** **The governing board annually approves an organization-wide budget.**
- Standard 8.10** **The fiscal policies have been reviewed by staff within the past 2 years, updated as necessary, with changes approved by the governing board.**
- Standard 8.11** **A written procurement policy is in place and has been reviewed by the governing board within the past 5 years.**
- Standard 8.12** **The organization documents how it allocates shared costs through an indirect cost rate or through a written cost allocation plan.**
- Standard 8.13** **The organization has a written policy in place for record retention and destruction.**

CATEGORY NINE: Data and Analysis

The Community Action Network moves families out of poverty every day across this country and needs to produce data that reflect the collective impact of these efforts. Individual stories are compelling when combined with quantitative data: *no data without stories and no stories without data*. Community Action needs to better document the outcomes families, agencies, and communities achieve. The Community Services Block Grant funding confers the obligation and opportunity to tell the story of agency-wide impact and community change, and in turn the impact of the Network as a whole.

- Standard 9.1** **The organization has a system or systems in place to track and report client demographics and services customers receive.**

- Standard 9.2** **The organization has a system or systems in place to track family, agency, and/or community outcomes.**

- Standard 9.3** **The organization has presented to the governing board for review or action, at least within the past 12 months, an analysis of the agency's outcomes and any operational or strategic program adjustments and improvements identified as necessary.**

- Standard 9.4** **The organization submits its annual CSBG Information Survey data report and it reflects client demographics and organization-wide outcomes.**

Organizational Standards For Public CSBG Eligible Entities

MAXIMUM FEASIBLE PARTICIPATION

CATEGORY ONE: Consumer Input and Involvement

Community Action is rooted in the belief that people with low incomes are in the best position to express what they need to make a difference in their lives. CSBG eligible entities work in partnership with the people and communities they serve. Community Action works in a coordinated and comprehensive manner to develop programs and services that will make a critical difference in the lives of participants. Individuals and families are well attuned to what they need, and when Community Action taps into that knowledge, it informs our ability to implement high impact programs and services.

Research shows that through engagement in community activities such as board governance, peer to peer leadership, advisory bodies, volunteering, and other participatory means, the poor build personal networks and increase their social capital so that they are able to move themselves and their families out of poverty. Community Action is grounded in helping families and communities build this social capital for movement to self-sufficiency.

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

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

Standard 1.3 **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

No CSBG eligible entity can meet all of a community's needs independently. Through formal and informal partnerships, ongoing community planning, advocacy, and engagement of people with low incomes, partners ranging from community and faith-based organizations, educational institutions, government, and business can work together with Community Action agencies and other CSBG eligible entities to successfully move families out of poverty and revitalize communities.

Community Action is often the backbone organization of community efforts to address poverty and community revitalization: leveraging funds, convening key partners, adding the voice of the underrepresented, and being the central coordinator of efforts. It is not an easy role to play, but a vital one for families and communities.

- Standard 2.1** **The 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 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 2.3** **The department communicates its activities and its results to the community.**

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

CATEGORY THREE: Community Assessment

Local control of Federal CSBG resources is predicated on regular comprehensive community assessments that take into account the breadth of community needs as well as the partners and resources available in a community to meet these needs. Regular assessment of needs and resources at the community level is the foundation of Community Action and a vital management and leadership tool that is used across the organization and utilized by the community to set the course for both CSBG and all agency resources.

- Standard 3.1** **The department conducted or was engaged in a community assessment and issued a report within the past 3 years, if no other report exists.**

- Standard 3.2** **As part of the community assessment, the 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 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 tripartite board/advisory body formally accepts the completed community assessment.**

VISION AND DIRECTION

CATEGORY FOUR: Organizational Leadership

Community Action leadership is exemplified at all levels across the organization and starts with a mission that clarifies Community Action's work on poverty. A well-functioning board, a focused department head, well-trained and dedicated staff, and volunteers giving of themselves to help others will establish Community Action as the cornerstone and leverage point to address poverty across the community. Ensuring strong leadership both for today and into the future is critical.

This category addresses the foundational elements of mission as well as the implementation of the Network's model of good performance management (ROMA). It ensures CAAs have taken steps to plan thoughtfully for today's work and tomorrow's leadership.

Standard 4.1 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 department's Community Action plan is outcome-based, anti-poverty focused, and ties directly to the community assessment.

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

Standard 4.4 The tripartite board/advisory body receives an annual update on the success of specific strategies included in the Community Action plan.

Standard 4.5 The department adheres to its local government's policies and procedures around interim appointments and processes for filling a permanent vacancy.

Standard 4.6 The department complies with its local government's risk assessment policies and procedures.

CATEGORY FIVE: Board Governance

Community Action boards are uniquely structured to ensure maximum feasible participation by the entire community, including those the Network serves. By law, Community Action boards are comprised of at least 1/3 low-income consumers (or their representatives), 1/3 elected officials (or their appointees), and the remainder private-sector community members. To make this structure work as intended, CAAs must recruit board members thoughtfully, work within communities to promote opportunities for board service, and orient, train, and support them in their oversight role. Boards are foundational to good organizational performance and the time invested to keep them healthy and active is significant, but necessary.

Standard 5.1 The department's tripartite board/advisory body is structured in compliance with the CSBG Act, by either:

1. Selecting the board members as follows:

- At least one third are democratically-selected representatives of the low-income community;
- One-third are local elected officials (or their representatives); and
- The remaining members are from major groups and interests in the community; or

2. Selecting the board through another mechanism specified by the State to assure decision-making and participation by low-income individuals in the development, planning, implementation, and evaluation of programs.

Standard 5.2 The department's tripartite board/advisory body either has:

1. Written procedures that document a democratic selection process for low-income board members adequate to assure that they are representative of the low-income community, or

2. Another mechanism specified by the State to assure decision-making and participation by low-income individuals in the development, planning, implementation, and evaluation of programs.

Please note under IM 82 for Public Entities the law also requires that a minimum of 1/3 of tripartite board membership be comprised of representatives of low-income individuals and families who reside in areas served.

Standard 5.3 Not applicable: Review of bylaws by an attorney is outside of the purview of the department and the tripartite board/advisory body, therefore this standard does not apply to public entities.

Standard 5.4 The department documents that each tripartite board/advisory body member has received a copy of the governing documents, within the past 2 years.

Standard 5.5 The department's tripartite board/advisory body meets in accordance with the frequency and quorum requirements and fills board vacancies as set out in its governing documents.

Standard 5.6 Each tripartite board/advisory body member has signed a conflict of interest

policy, or comparable local government document, within the past 2 years.

Standard 5.7 The department has a process to provide a structured orientation for tripartite board/advisory body members within 6 months of being seated.

Standard 5.8 Tripartite board/advisory body members have been provided with training on their duties and responsibilities within the past 2 years.

Standard 5.9 The department's tripartite board/advisory body receives programmatic reports at each regular board/advisory meeting.

CATEGORY SIX: Strategic Planning

Establishing the vision for a Community Action agency is a big task and setting the course to reach it through strategic planning is serious business. CSBG eligible entities take on this task by looking both at internal functioning and at the community's needs. An efficient organization knows where it is headed, how the board and staff fit into that future, and how it will measure its success in achieving what it has set out to do. This agency-wide process is board-led and ongoing. A "living, breathing" strategic plan with measurable outcomes is the goal, rather than a plan that gets written but sits on a shelf and stagnates. Often set with an ambitious vision, strategic plans set the tone for the staff and board and are a key leadership and management tool for the organization.

- Standard 6.1** **The department has a strategic plan, or comparable planning document, in place that has been reviewed and accepted by the tripartite board/advisory body within the past 5 years. If the department does not have a plan, the tripartite board/advisory body will develop the plan.**

- Standard 6.2** **The approved strategic plan, or comparable planning document, addresses reduction of poverty, revitalization of low-income communities, and/or empowerment of people with low incomes to become more self-sufficient.**

- Standard 6.3** **The approved strategic plan, or comparable planning document, contains family, agency, and/or community goals.**

- Standard 6.4** **Customer satisfaction data and customer input, collected as part of the community assessment, is included in the strategic planning process, or comparable planning process.**

- Standard 6.5** **The tripartite board/advisory body has received an update(s) on progress meeting the goals of the strategic plan/comparable planning document within the past 12 months.**

OPERATIONS AND ACCOUNTABILITY

CATEGORY SEVEN: Human Resource Management

The human element of Community Action's work is evident at all levels of the organization and the relationship an organization has with its staff often reflects the organization's values and mission. Oversight of the department head and maintaining a strong human resources infrastructure are key responsibilities of board oversight. Attention to organizational elements such as policies and procedures, performance appraisals, and training lead to strong organizations with the capacity to deliver high-quality services in low-income communities.

- Standard 7.1** **Not applicable: Local governmental personnel policies are outside of the purview of the department and the tripartite board/ advisory body, therefore this standard does not apply to public entities.**
- Standard 7.2** **The department follows local governmental policies in making available the employee handbook (or personnel policies in cases without a handbook) to all staff and in notifying staff of any changes.**
- Standard 7.3** **The department has written job descriptions for all positions. Updates may be outside of the purview of the department.**
- Standard 7.4** **The department follows local government procedures for performance appraisal of the department head.**
- Standard 7.5** **The compensation of the department head is made available according to local government procedure.**
- Standard 7.6** **The department follows local governmental policies for regular written evaluation of employees by their supervisors.**
- Standard 7.7** **The department provides a copy of any existing local government whistleblower policy to members of the tripartite board/advisory body at the time of orientation.**
- Standard 7.8** **The department follows local governmental policies for new employee orientation.**
- Standard 7.9** **The department conducts or makes available staff development/training (including ROMA) on an ongoing basis.**

CATEGORY EIGHT: Financial Operations and Oversight

The fiscal bottom line of Community Action is not isolated from the mission; it is a joint consideration. Community Action boards and staff maintain a high level of fiscal accountability through audits, monitoring by State and Federal agencies, and compliance with Federal Office of Management Budget circulars. The management of Federal funds is taken seriously by CSBG eligible entities and the Standards specifically reflect the board's oversight role as well as the day-to-day operational functions.

- Standard 8.1** The department's annual audit is completed through the local governmental process in accordance with Title 2 of the Code of Federal Regulations, Uniform Administrative Requirements, Cost Principles, and Audit Requirement (if applicable) and/or State audit threshold requirements. This may be included in the municipal entity's full audit.
- Standard 8.2** The department follows local government procedures in addressing any audit findings related to CSBG funding.
- Standard 8.3** The department's tripartite board/advisory body is notified of the availability of the local government audit.
- Standard 8.4** The department's tripartite board/advisory body is notified of any findings related to CSBG funding.
- Standard 8.5** Not applicable: The audit bid process is outside of the purview of tripartite board/advisory body therefore this standard does not apply to public entities.
- Standard 8.6** Not applicable: The Federal tax reporting process for local governments is outside of the purview of tripartite board/advisory body therefore this standard does not apply to public entities.
- Standard 8.7** The tripartite board/advisory body receives financial reports at each regular meeting, for those program(s) the body advises, as allowed by local government procedure.
- Standard 8.8** Not applicable: The payroll withholding process for local governments is outside of the purview of the department, therefore this standard does not apply to public entities.
- Standard 8.9** The tripartite board/advisory body has input as allowed by local governmental procedure into the CSBG budget process.
- Standard 8.10** Not applicable: The fiscal policies for local governments are outside of the purview of the department and the tripartite board/advisory body, therefore this standard does not apply to public entities.
- Standard 8.11** Not applicable: Local governmental procurement policies are outside of the purview of the department and the tripartite board/advisory body, therefore this standard does not apply to public entities.
- Standard 8.12** Not applicable: A written cost allocation plan is outside of the purview of the department and the tripartite board/advisory body, therefore this standard does not apply to public entities.

Standard 8.13

The department follows local governmental policies for document retention and destruction.

CATEGORY NINE: Data and Analysis

The Community Action Network moves families out of poverty every day across this country and needs to produce data that reflect the collective impact of these efforts. Individual stories are compelling when combined with quantitative data: *no data without stories and no stories without data*. Community Action needs to better document the outcomes families, agencies, and communities achieve. The Community Services Block Grant funding confers the obligation and opportunity to tell the story of agency-wide impact and community change, and in turn the impact of the Network as a whole.

- Standard 9.1** **The department has a system or systems in place to track and report client demographics and services customers receive.**

- Standard 9.2** **The department has a system or systems in place to track family, agency, and/or community outcomes.**

- Standard 9.3** **The department has presented to the tripartite board/advisory body for review or action, at least within the past 12 months, an analysis of the agency’s outcomes and any operational or strategic program adjustments and improvements identified as necessary.**

- Standard 9.4** **The department submits its annual CSBG Information Survey data report and it reflects client demographics and CSBG-funded outcomes.**