State Management Practices: CSBG Organizational Standards

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Today’s Agenda

• Brief Overview of CSBG Organizational Standards
• Interpretation of Standards
• Assessment of and Reporting on Standards
• T/TA & Corrective Action Approaches
Brief Overview

The National Community Action Network Theory of Change
Community Action Goals

Services and Strategies

Core Principles
- Broad-based, community-driven strategies
- Effective partnerships w/donors & customers
- Efficient manages resources
- Networked service delivery system
- Strong & supportive community

Engage in Capacity Development
- Increase the knowledge, skills, and abilities of the community
- Strengthen the community, its leaders, and its organizations
- Improve the community's ability to plan, fund, and implement programs

Information Memorandum (IM) 138

COMMUNITY SERVICES BLOCK GRANT

Information Memorandum

To: State Community Services Block Grant (CSBG) Administrators, U. S. Territory CSBG Administrators, Eligible Entities, and State Community Action Agencies

Subject: Establishment of Organizational Standards for CSBG Eligible Entities under 658B of the CSBG Act, 42 U.S.C. § 9914
CSBG Organizational Standards
Organized into three thematic groups

- 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

General Purpose of and Approach to Standards
- Demonstrate **accountability** across a complex system
- Work together to characterize an effective and healthy organization
- Build **trust**
- Provide a roadmap for continuous Organizational improvement
- Have **buy-in** at all levels

Role of Federal Office of Community Services
- Accept the State plan
  - Includes targets for % of Agencies meeting 100% of the Standards
- Receives the Annual Report
  - Includes actual % of Agencies meeting 70%, 80%, 90% and 100% of the Standards
  - Describe T/TA efforts provided to Agencies
- Monitoring state CSBG offices
  - On Site
  - Desk/Review of State Plans/Annual Reports
Resources

- Assessment Tool
- Separate Tools for States and CAAs
- Separate Tool for Private and Public CAA State Assessments
- Includes Final COE-Developed Standards Language
- COE Guidance

Templates

- States and CAAs
- Summary Sheet
- Documentation Packet

Balancing Act

Local Resources and Capacities

Need for a Robust System
General Reminders

- Many of the Standards address processes, not participation in the processes
- Keep it direct and straightforward
- All parties work together to meet the Standards
- No one is 100% correct on anything 100% of the time. Human beings are doing this work at both the CAA and State CSBG Office and we need to work together.

Interpretation of Standards

Common “Gray” Standards

- **Standard 1.3: Nonprofit/Public**
  - The org./dept. has a systematic approach for collecting, analyzing, and reporting customer satisfaction data to the governing/tripartite board (which for public CAAs may be met through broader local gov’t processes).

- **Standard 3.4: Nonprofit/Public**
  - The community assessment includes key findings on the causes and conditions of poverty and the needs of the communities assessed.
Common “Gray” Standards

**Standard 4.1: Nonprofit/Public**
- The governing/tripartite board has reviewed the org’s/dept’s mission statement within the past 5 years and assured that: 1. The mission addresses poverty; and 2. The org’s/CSBG programs and services are in alignment with the mission.

**Standard 4.3: Nonprofit/Public**
- Org’s/dept’s Community Action plan and strategic plan document the continuous use of the full ROMA cycle or comparable system (assessment, planning, implementation, achievement of results, and evaluation). In addition, the org/dept documents having used the services of a ROMA-certified trainer (or equivalent) to assist in implementation.

**Standard 4.6: Nonprofit/Public**
- Nonprofit: Org-wide, comprehensive risk assessment has been completed within the past 2 years and reported to the governing board/Public: dept complies w/ its local gov’t’s risk assessment policies and procedures.

**Standard 6.2: Nonprofit/Public**
- The org/dept has presented to the governing/tripartite 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 9.3: Nonprofit/Public**
- The approved strategic plan (or for public CAAs a 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.
Interpretation Tips

• Focus on intent behind standard
• Use Partnership Center of Excellence T/TA Guides which offer very helpful guidance but are NOT binding
• Consider meeting with state association/CAAs to discuss their understanding of a standard
• Consult with NASCSP/other state CSBG offices on general interpretations
• Keep interpretation straightforward and be cautious not to interpret additional meaning into the Standards

Assessment of and Reporting on Standards

IM 138: Assessment

Assessment of Standards

States are responsible for ensuring that the eligible entities meet all State-established program-level standards. Some standards (i.e., strategic planning, developing an agency-wide strategic plan, etc.) may take several years for eligible entities to meet, but every entity must make steady progress toward the goal of meeting all standards.
Assessment Tips

• Remember the standards establish a “framework” for CAAs to work within
• Each CAA is unique
• Focus on policies and procedures
  — e.g., does a CAA have a disaster awareness policy? NOT, is the CAA conducting 5 fire drills
  — Did they do an organizational risk assessment? NOT, the results or recommendations are XYZ
• AGAIN, Partnership’s Center of Excellence T/TA guides are GREAT but NOT binding

IM 138: Annual Report

COMMUNITY SERVICES BLOCK GRANT
U.S. Department of Health and Human Services
Administration for Children and Families
Office of Community Services
Division of State Assistance
370 L'Enfant Promenade, SW,
Washington, DC 20447

Information Memorandum

Transmittal No. 138
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CSBG Model State Plan and Annual Report

States will report on the status of eligible entities based on organizational standards through the required CSBG Annual Report. In past years, States have fulfilled their annual reporting requirements, under section 6(c)(2) of the CSBG Act (42 U.S.C. § 9913(a)(2)), by providing data for the CSBG Information Survey. In the future, OCS will provide new instructions for States regarding annual reporting.

Reporting Tips

• Provide an opportunity to correct issue six months prior to state reporting
• Combine on-site with desk reviews
• Provide online portal for document uploading
T/TA and Corrective Action Approaches

IM 138: T/TA & Corrective Action

Training & Technical Assistance

- T/TA may be appropriate if noncompliance relates to organizational standard(s) and the CAA is able to meet standard(s) in a reasonable time frame contingent on some targeted T/TA

- State and CAA may:
  - Develop T/TA plan to target T/TA resources
  - Outline time frame

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Training & Technical Assistance

- State CSBG office is required to offer T/TA, if appropriate, to help correct a deficiency
  - If provides T/TA, must prepare and submit a report to OCS describing T/TA offered
  - If does not provide T/TA, must prepare and submit a report stating reasons for its determination

42 U.S.C. § 9915(a)(3)

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IM 138: T/TA & Corrective Action

Opportunity to Submit a QIP

- State may allow a CAA not meeting organizational standard(s) to submit a QIP in accordance with federal CSBG Act QIP requirements
- QIP must include:
  - Clear timelines
  - Benchmarks for progress

OCS IM 138
JO2  Is not meeting an Organizational Standard considered a deficiency?
Jackie Orr, 2/15/2018
Opportunity to Submit a QIP

- Within state’s discretion to give CAA opportunity to develop and implement a QIP to correct a deficiency
  - State must take into account the seriousness of a deficiency and the time required to correct
- If state grants CAA opportunity to submit a QIP, must:
  - Give CAA 60 days to develop and implement it
  - Approve/not approve within 30 days of receiving QIP from CAA

42 U.S.C. § 9915(a)(4)

Strategies

- Learn from peers
  - Ex. Washington CSBG office approach
- Focus on organizations that are really struggling
- Deploy intensive training/deep dive technical assistance
  - Ex. Partnership work in Texas on needs assessment and strategic plans
- State Office and CAAs work in partnership/collaboration

Technical Assistance Plan Tracking Form
Tools Already Available to Help CAAs Meet the Standards