



---

---

---

---

---

---

---

---



---

---

---

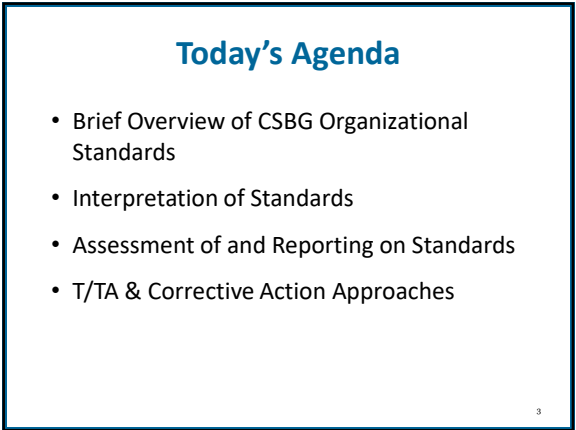
---

---

---

---

---



---

---

---

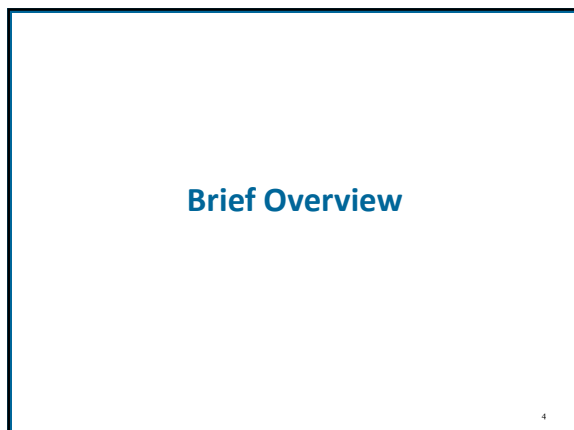
---

---

---

---

---



## Brief Overview

4

---

---

---

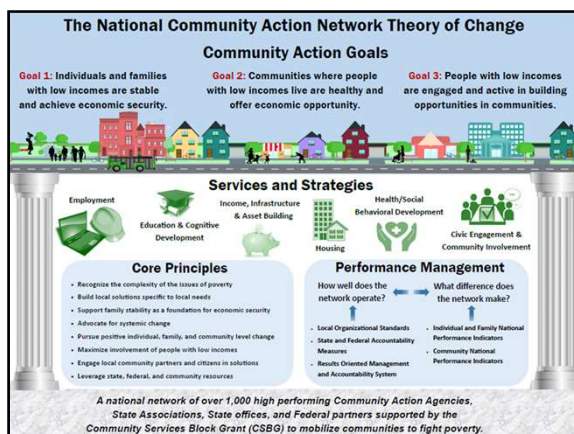
---

---

---

---

---




---

---

---

---

---

---

---

---

## Information Memorandum (IM) 138

---

<p><b>COMMUNITY SERVICES BLOCK GRANT</b></p> <p>Information Memorandum</p>	<p>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, S.W. Washington, D.C. 20447</p>
--	--

---

Transmittal No. 138	Date: January 26, 2015
---------------------	------------------------

---

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

SUBJECT: State Establishment of Organizational Standards for CSBG Eligible Entities under 678B of the CSBG Act, 42 U.S.C. § 9914

6

---

---

---

---

---

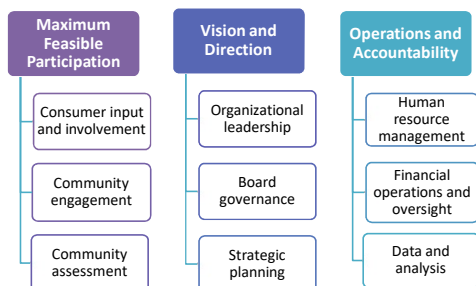
---

---

---

## CSBG Organizational Standards

Organized into three thematic groups



7

---

---

---

---

---

---

---

---

## 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

8

---

---

---

---

---

---

---

---

## 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

9

---

---

---

---

---

---

---

---

---

---

---

---

---

---

---

---

---

---

---

---

---

---

---

---

---

---

### 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 time. Human beings are doing this work at both the CAA and State CSBG Office and we need to work together.

13

---

---

---

---

---

---

---

### Interpretation of Standards

14

---

---

---

---

---

---

---

### 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.

15

---

---

---

---

---

---

---

## 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.

16

---

---

---

---

---

---

---

---

## Common “Gray” Standards

### 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.

17

---

---

---

---

---

---

---

---

## Common “Gray” Standards

### Standard 6.2: 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.**

### Standard 9.3: 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.**

18

---

---

---

---

---

---

---

---

## 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 straight forward** and be cautious not to interpret additional meaning into the Standards

19

## Assessment of and Reporting on Standards

20

## IM 138: Assessment

### COMMUNITY SERVICES BLOCK GRANT

#### Information Memorandum

Transmittal No. 138

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, S.W.  
Washington, D.C. 20447

Date: January 26, 2015

#### *Assessment of Standards*

• • •

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

21

## 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

22

## IM 138: Annual Report

### COMMUNITY SERVICES BLOCK GRANT

#### Information Memorandum

Transmittal No. 138

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, S.W.  
Washington, D.C. 20447

Date: January 26, 2015

• • •

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 may have fulfilled their annual reporting requirements, under section 678E(a)(2) of the CSBG Act (42 U.S.C. § 9917(a)(2)), by providing data for the CSBG Information Survey. In the future, OCS will provide new instructions for States regarding annual reporting.

23

## 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

24



## T/TA and Corrective Action Approaches

25

## IM 138: T/TA & Corrective Action

### COMMUNITY SERVICES BLOCK GRANT

#### Information Memorandum

Transmittal No. 138

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, S.W.  
Washington, D.C. 20447

Date: January 26, 2015

• • •

#### Corrective Action

During the assessment process, if a State finds an eligible entity is not meeting a standard or set of standards, the State's response will depend on the circumstances. In cases where the eligible entity may be able to meet the standard in a reasonable time frame contingent on some targeted technical assistance, the State and entity may develop a technical assistance plan to target

26

## 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

OCS Information Memorandum (IM) 138

27

02

## 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)

28

---

---

---

---

---

---

---

---

## IM 138: T/TA & Corrective Action

### 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, S.W.  
Washington, D.C. 20447

#### Information Memorandum

Transmittal No. 138

Date: January 26, 2015

• • •

training and technical assistance resources and outline a time frame for the entity to meet the standard(s). If appropriate in other situations, the State may initiate action in accordance with section 678C of the CSBG Act (42 U.S.C. § 9915), including the establishment of a Quality Improvement Plan (QIP) with clear timelines and benchmarks for progress.

As long as the State is confident that the eligible entity is moving toward meeting standards, under a technical assistance plan, QIP, or other oversight mechanism, the State should not initiate action to terminate or reduce funding.

29

---

---

---

---

---

---

---

---

## 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

30

---

---

---

---

---

---

---

---

## Slide 28

---

**J02**

Is not meeting an Organizational Standard considered a deficiency?

Jackie Orr, 2/15/2018



**Tools Already Available to Help CAAs Meet the Standards**

ONLINE TOOLS . . . .

**Nonprofit Risk Management Center**  
Find the answer here: [nrcgrants.org](http://nrcgrants.org)

**AUDIT ESSENTIALS**  
What Every Board Member Needs to Know

**CAPLAW**  
Legal and Financial Resources for Community Builders

**Preparing for Your Community's Action Agency's Future: Sustainability, Succession & Transition**

**COST ALLOCATION**  
A Practical, Accessible and Comprehensive and Practical Resource

**MONITORING MAP FOR CAAs**  
A GUIDE FOR NAVIGATING THE CORE REVIEW PROCESS

**EXEMPLARY LEGAL PRACTICES & POLICIES GUIDEBOOK**  
PART I: On the Right Track

**Vision**

How CAAs Can Cultivate a Culture of Compliance and High Ethical Standards

---

---

---

---

---

---

---