State Management Work Group | Policies and Procedures Promising Practices

Purpose
The promising practices identified, and tools, templates, and resources shared in this document are the result of extensive research conducted over a three-year period by the State Management Work Group (SMWG). SMWG members helped identify the information shared here by analyzing the 2021 **American Customer Satisfaction Survey** (ACSI), conducting extensive research of high-scoring states, collecting and developing tools as well as other training and technical assistance (TTA) to help State Administrators with the implementation of these promising practices. The ultimate goal of this work is to improve service delivery to the CAAs and increase satisfaction with the state office, leading to improved ACSI scores.

What is the purpose of Policies and Procedures?
The CSBG Act mandates certain aspects of how state CSBG offices will operate but leaves significant authority and flexibility in the hands of the States. Policies are the rules or guidelines governing State CSBG operations while procedures determine the specific means to implement the policies. Policies provide the State with a method to ensure compliance, set standards that demand high quality, minimize risk, and define operations. Policies and procedures are a living document that changes as new information and issues are identified and practices are adjusted.

Promising Practices:
1. *Consistent, timely review of policies, ahead of OCS review* – Intentional regular review of the State's policies and procedures to ensure that CSBG Act mandates, OCS guidance, and/or any State laws and regulations that impact the administration of CSBG funding are accurate and up to date

2. *Engage the Network and Stakeholders throughout the process* – Identify and engage all relevant stakeholders (i.e., legal counsel, other state departments, State Associations, eligible entities, etc.) in multiple ways throughout the update process to ensure buy-in at all levels

3. *Minimize administrative burden* – The elimination of policies that create administratively burdensome program requirements for both eligible entities and States and are not a requirement of the CSBG Act, OCS Guidance, and/or State laws or regulations

1. ***Consistent, timely review of policies, ahead of OCS review*** – Intentional regular review of the State's policies and procedures to ensure that CSBG Act mandates, OCS guidance, and/or any State laws and regulations that impact the administration of CSBG funding are accurate and up to date

States Who Have Employed This Practice:
Arizona, Georgia, Kentucky, Maryland, Massachusetts, Ohio, Washington, Utah

Purpose:
Consistent, timely review of policies and procedures helps to ensure that States are following the CSBG Act mandates, incorporating guidance provided by the Office of Community Services (OCS), and that any State laws and regulations that affect the administration of CSBG are included. It is especially helpful to conduct a review of your state's policies and procedures ahead of an OCS review. This allows the State to determine if the policies and procedures are up-to-date, and accurate, as well as can help reduce the risk of an OCS finding or concern.

Method:
States should develop a feasible timeline based on States' tasks and/or OCS to review policies and procedures, at minimum States should review/update their manual annually or biannually. It is important to identify all relevant stakeholders to include (i.e., legal counsel, other state departments, State Associations, eligible entities, etc.), and gather all federal and state regulations that impact policies. States should engage their Network and gather feedback throughout the development process while being mindful of the impact policy changes may have on service implementation at the local level. To do this, States can form a workgroup, have regular meetings with the Network, and/or share policy drafts to gather feedback. Involving the State Association can help with Network engagement. The average length of time to review and update policies is approximately three to four months, depending on the policy and update type (complete overhaul vs. one policy change).

Challenges:
Having the staff capacity needed for a full policy and procedures update was identified as the greatest challenge. State Administrators will need to be intentional to set aside time for policy review, updates, and engagement of all relevant stakeholders. Scheduling consistent, regular meetings both internally and with all relevant stakeholders can help to reduce this burden.

Benefits:

States found that consistent, timely reviews of policies helped to provide eligible entities needed guidance that clearly defines program requirements, ideally allowing clients to easily access services in a timely manner. It helps to establish the State's expectations of eligible entities to effectively administer CSBG funding and defines what States will monitor. Updated policies support new staff training efforts at both the State and local levels as well as help to institute historical knowledge for the Network. Reviews and/or updates ahead of an OCS review reduce the likelihood of concerns and/or findings by ensuring that States are following their own policies and procedures when administering and monitoring eligible entities.

Tools/Templates/Resources:

- See the State Management Work Group Page

2. ***Engage the Network and Stakeholders throughout the process*** – Identify and engage all relevant stakeholders (i.e., legal counsel, other state departments, State Associations, eligible entities, etc.) in multiple ways throughout the update process to ensure buy-in at all levels

States Who Have Employed This Practice:
Arizona, Colorado, Georgia, Kentucky, Maryland, Massachusetts, Minnesota, Utah, Vermont, Wisconsin

Purpose:
ACSI top-scoring states indicated they engage all relevant stakeholders before, during, and upon completion of policies and procedures updates. This type of engagement helps to clear, constant, and consistent communication as well as gather valuable feedback that affects the administration of CSBG funding at both the State and local levels. Ensuring all relevant stakeholder needs are understood and incorporated at the beginning of the project helps minimize rework and ensure concerns are addressed early on. Ensuring stakeholder engagement fosters strong, collaborative relationships at all levels.

Method:
It is important to identify all relevant stakeholders who may have an impact on any policy changes such as the state's legal department, fiscal department, State Association, eligible entities, etc. State Administrators should know who in their office needs to be made aware of changes, and what the internal approval process entails. Engaging the network before, during, and after policy updates can be facilitated by tools like virtual and in-person meetings, surveys, requests for feedback, and/or email. Planning ahead for milestones that warrant communication can help streamline the process. The gathering, aggregation, analysis, incorporation, and communication of the impact of feedback ensures stakeholder engagement and buy-in. This can help to reduce pushback from the Network on policy changes as they typically have a better understanding of any revisions and feel included in the process.

Challenges:
Some states reported that this process can be lengthy and time intensive such as managing meetings and communications. Additionally, internal stakeholders like lawyers can delay the process significantly. To reduce this, States should establish and regularly adjust realistic and comprehensive timelines to help internal project management as well as ensure accurate expectations among stakeholders. States should share any changes in the timeline

with stakeholders. Also, State Administrators should anticipate potential concerns and pushback regarding changes and listen thoroughly, closing the communication loop on issues whenever possible. Engaging the Network throughout the development process and explaining why something cannot be removed (i.e., CSBG Act requirement) may reduce pushback.

Benefits:

The Network has the most comprehensive understanding of client needs, so their feedback helps ensure the program works well for the clients served. When the Network is able to provide feedback on proposed changes, it can be an opportunity to streamline program management and affirm that policies align with programmatic capacity. This stakeholder engagement throughout the process helps eligible entities understand the metrics on which they will be monitored. Gathering feedback from all relevant stakeholders throughout the process minimizes the need to rework any updates because something was left out or not accurate. It also allows the State to address any concerns and reduces pushback during the implementation process. Including agencies in the review and/or development of policies helps to build strong, collaborative relationships between the CSBG State Lead Office and the eligible entities.

Tools/Templates/Resources:
- See the State Management Work Group Page

3. *Minimize administrative burden* – The elimination of policies that create administratively burdensome program requirements for both eligible entities and States and are not a requirement of the CSBG Act, OCS Guidance, and/or State laws or regulations

States Who Have Employed This Practice:
Minnesota, Kentucky, Maryland, Massachusetts, Ohio, Washington, Arizona, Utah, Vermont

Purpose:
States who scored well on the ACSI found that reducing the administrative burden was a key component in the development and dissemination of their policies and procedures. In doing so, it not only provides eligible entities with the capacity to effectively deliver services but also reduces the number of policies that States are required to monitor, thereby increasing capacity at both the State and local levels.

Method:
When reviewing policies and procedures States should look to remove anything repetitive or that does not have a sound explanation for remaining. It is helpful for States to cross-reference other program policies to see where policies can be more aligned. States should gather feedback from eligible entities specifically asking them which policies are burdensome. The State should also review eligible entity questions, monitoring findings and/or concerns, etc. to determine if policy changes are needed. Routine policy review and gathering consistent eligible entity feedback will be needed to sustain this practice.

Challenges:
Due to the flexible nature of CSBG, both the CSBG Act and OCS guidance can be vague which may result in State hesitancy to change policies. States were able to navigate policy changes better when they reached out to National Partners such as CAPLAW or NASCSP and/or other States with questions. Seeking guidance from internal program staff at the CSBG State Lead Office was also helpful.

Benefits:
Eligible entities have a better understanding of the State's CSBG requirements, allowing for more time to administer services instead of contract compliance. Less burdensome policies provide the State with more flexibility to quickly adapt under special circumstances (i.e., COVID, natural disasters, etc.). It also reduces the State's monitoring requirements allowing State Administrators more time to provide program support to eligible entities.

Tools/Templates/Resources:

- See the State Management Work Group Page