

# CSBG Organizational Standards Flexibilities

---

*September 25, 2023*



Hugh Poole | NCRI  
CSBG Director  
NASCSP  
[hpoole@nascsp.org](mailto:hpoole@nascsp.org)

Maribeth Schneber-Rhemrev | PMP, CCAP, NCRT  
Director, Organizational Capacity Building  
National Community Action Partnership  
[mschneberrhemrev@communityactionpartnership.com](mailto:mschneberrhemrev@communityactionpartnership.com)



# The Promise Of Community Action

---

*Community Action changes people's lives, embodies the spirit of hope, improves communities, and makes America a better place to live. We care about the entire community and we are dedicated to helping people help themselves and each other.*



1000+ Community Action Agencies  
leading change across America

# Shout it Out!



**What do you think of  
when you hear  
Organizational  
Standards?**

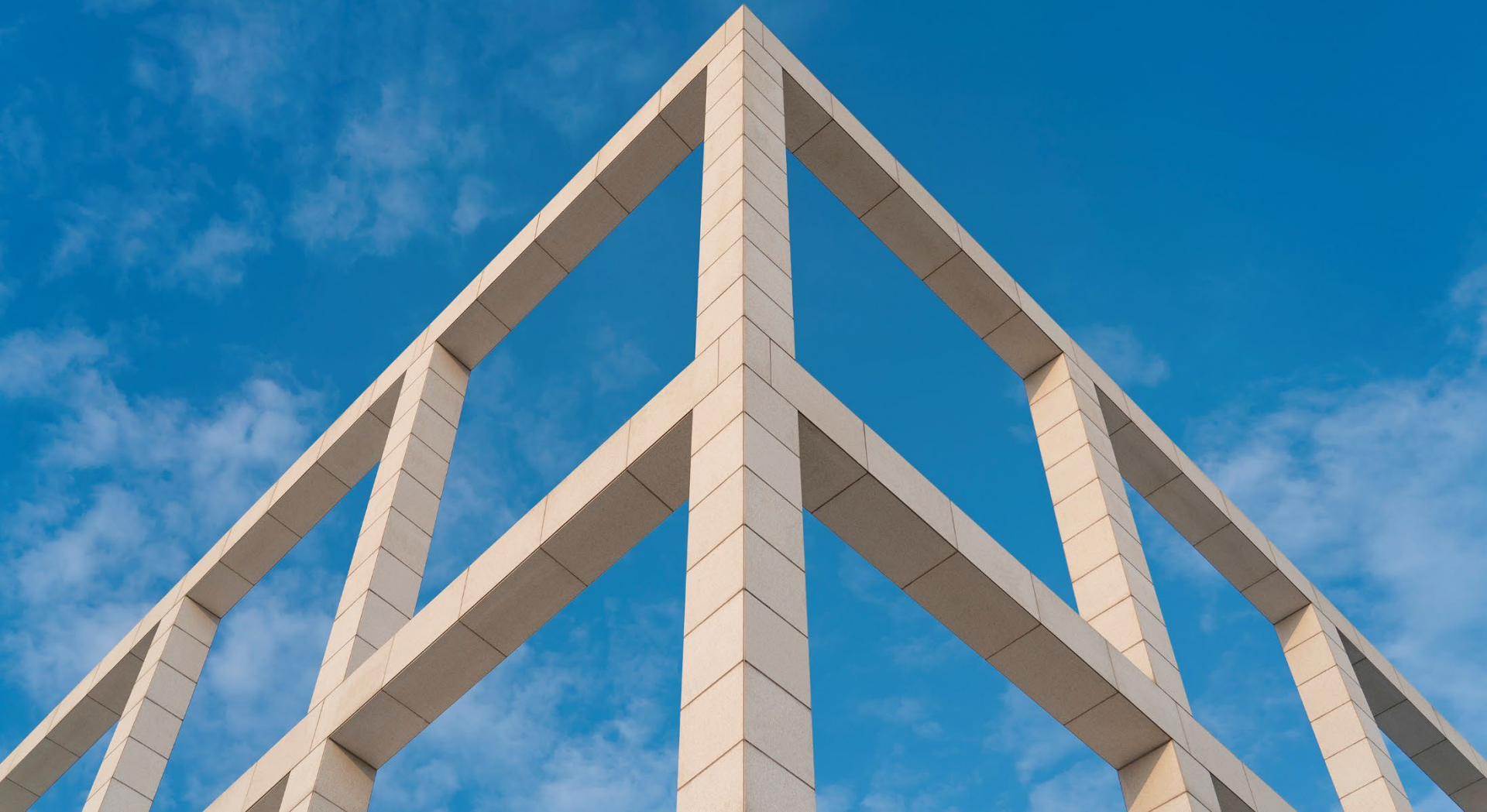
# Agenda

CSBG Organizational Standards Context & Overview

Assessing Organizational Standards

Common Flexibilities

# **ORGANIZATIONAL STANDARDS OVERVIEW**



# CSBG Organizational Standards

- Developed BY the Community Action network, FOR the network.
- Born out of the post-American Recovery and Reinvestment Act (ARRA) period, when there was a perception by some that CAAs were not high-performing.
- Developed through the Organizational Standards Center of Excellence at the Community Action Partnership, with the input of all levels of the Community Action Network, **the CSBG Organizational Standards work together to define the necessary capacities a Community Action Agency needs to be effective.**



# The National Community Action Network Theory of Change

## Community Action Goals

**Goal 1:** Individuals and families with low incomes are stable and achieve economic security.

**Goal 2:** Communities where people with low incomes live are healthy and offer economic opportunity.

**Goal 3:** People with low incomes are engaged and active in building opportunities in communities.



## Services and Strategies

Employment



Education & Cognitive Development



Income, Infrastructure & Asset Building



Housing

Health/Social Behavioral Development



Civic Engagement & Community Involvement



## Core Principles

- Recognize the complexity of the issues of poverty
- Build local solutions specific to local needs
- Support family stability as a foundation for economic security
- Advocate for systemic change
- Pursue positive individual, family, and community level change
- Maximize involvement of people with low incomes
- Engage local community partners and citizens in solutions
- Leverage state, federal, and community resources

## Performance Management

How well does the network operate?



- Local Organizational Standards
- State and Federal Accountability Measures
- Results Oriented Management and Accountability System

What difference does the network make?

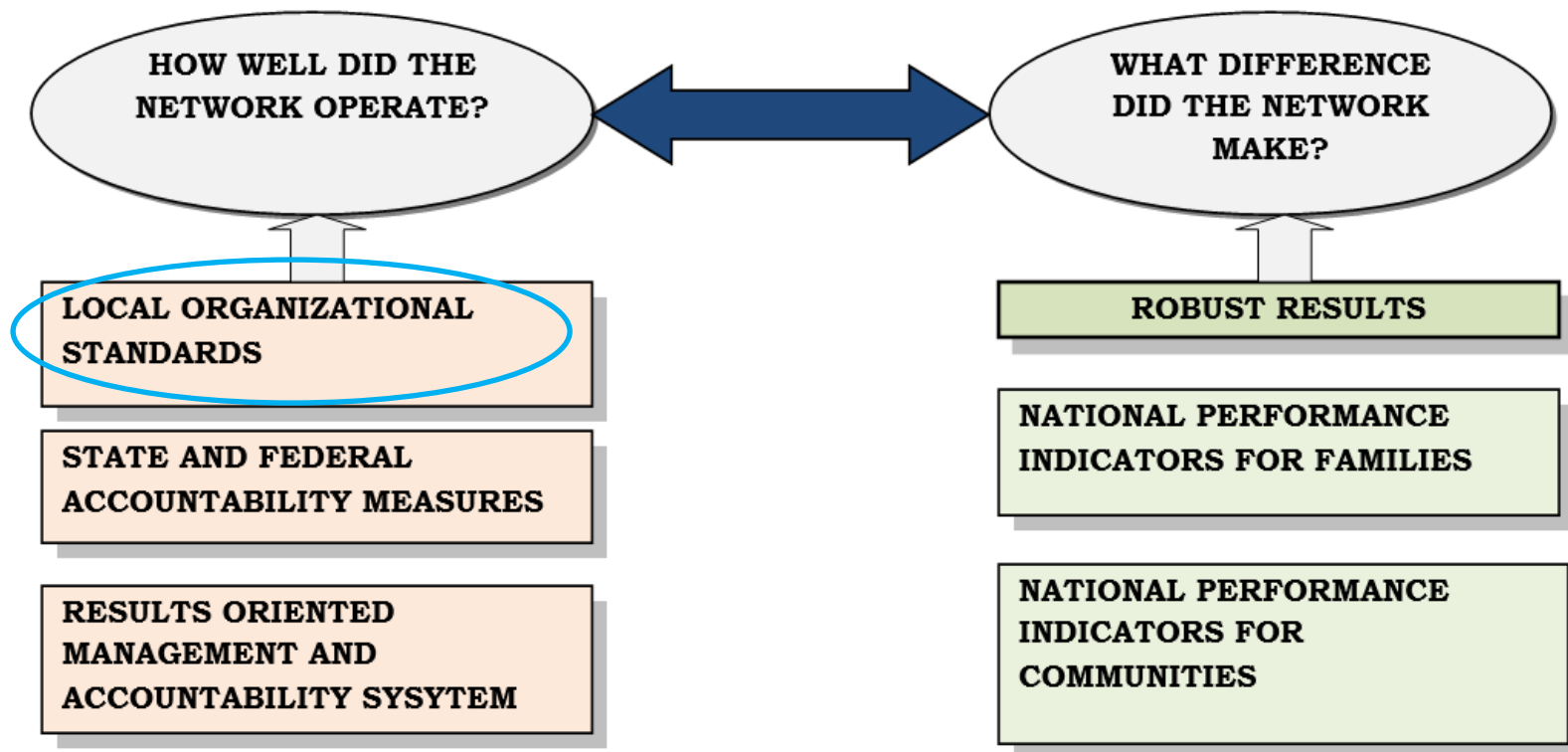


- Individual and Family National Performance Indicators
- Community National Performance Indicators

*A national network of over 1,000 high performing Community Action Agencies, State Associations, State offices, and Federal partners supported by the Community Services Block Grant (CSBG) to mobilize communities to fight poverty.*

# CSBG Performance Management Framework

## PERFORMANCE MANAGEMENT



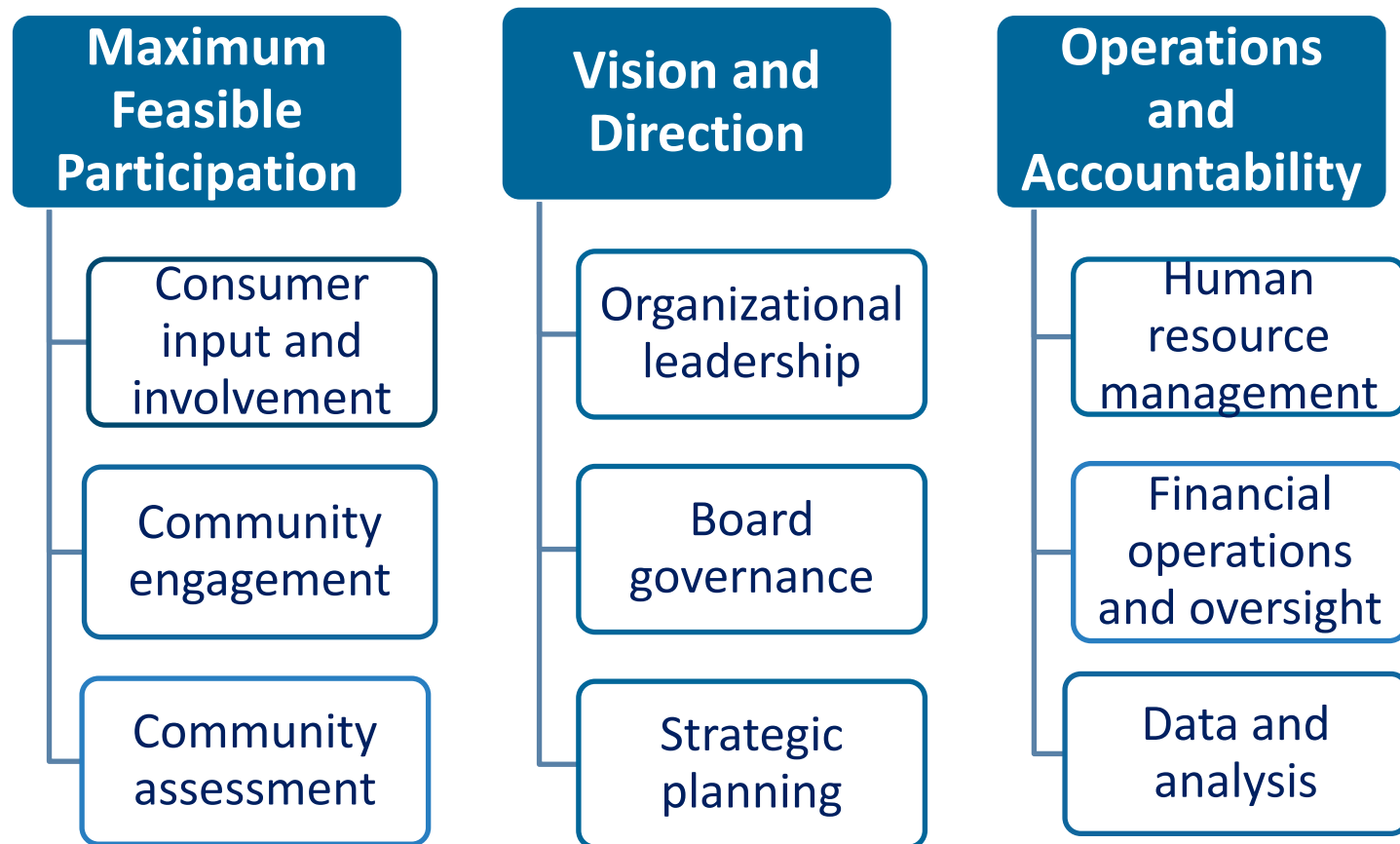


# CSBG Organizational Standards

Established in CSBG IM 138:

[https://www.acf.hhs.gov/sites/default/files/documents/ocs/im\\_138\\_csb\\_g\\_organizational\\_standards\\_fy\\_2015.pdf](https://www.acf.hhs.gov/sites/default/files/documents/ocs/im_138_csb_g_organizational_standards_fy_2015.pdf)

Organized into three thematic groups:



# Organizational Standards Differ for Public and Private CAAs

- Although Organizational Standards apply to most\* CSBG Eligible Entities, Public CAAs (typically units of Local Government) will note that some standards are slightly different or not applicable to them.
  - There are no additional Standards for public CAAs, and the differences between public CAA standards typically reflect the differences in public CAA administration.

# National Standards; State Administration

- CSBG is a Block Grant – meaning, the Feds provide general guidance, and then leave administration up to the States who they block grant the funding to.
- States (not the feds) are responsible for providing guidance and assessing compliance with the Organizational Standards.
  - Implementation, guidance, and assessment of Organizational Standards will differ from state to state
  - The Organizational Standards are intentionally broad – meant to recognize the need for each state and local CAA to be responsive to local needs
  - Specific/required documentation, processes, etc. are intentionally NOT prescribed in many cases by the Standards themselves; these requirements are set by your state.
- States are required to assess Organizational Standards on an annual basis
  - The Standards are assessed as either met or unmet (no partial credit!)
  - CSBG Organizational Standards assessments go to the presence of an item, not the quality of it



# A Capacity Frame

- Contract monitoring assures compliance – Organizational Standards assessments seek to ensure agencies have the necessary capacity to administer CSBG
- When assessing if a Standard is met or unmet, ensure that frame is centered

# 100% is Not Always Possible

- Although agencies should strive to meet 100% of the Organizational Standards, it's not always possible.
  - Missing one standard (so long as it's not tied to a legal requirement) should not result in catastrophic consequences.
    - States cannot terminate or withhold funding without cause and following the processes detailed in the CSBG Act and CSBG IM 116.
  - Missing standards will often result in a corrective action plan, technical assistance plan, or a quality improvement plan.
- However!!!
  - consistently missing the same standard or having a pattern of noncompliance could, through the process outlined in IM 116, ultimately result in termination of funding.
  - Some Standards tie to other requirements that are essential to eligible entity status (ie, board requirements)





# Organizational Standards are Only a Piece of the (Compliance) Picture

# Organizational Standards Myth Busting

Organizational Standards are about capacity

Organizational Standards are not excellence standards

Organizational Standards interpretation is up to the State Office

Organizational Standards are not all equal

Organizational Standards are not a complete picture of an agency

# Common Flexibilities that the State Can Exercise

## Documentation Requirements

## Timing

- Interpretation of “year”
- Period to upload materials/assessment period

## “Cure” Periods

## Approach

**While the State cannot exempt agencies from Organizational Standards, they can get creative to help agencies who are responding to disasters or in extenuating circumstances**

# Flexibility Considerations

---

Some requirements can't be flexed (IE, those from the CSBG Act)

---

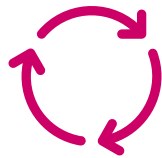
Centering capacity – what is best for ensuring the agency has what it needs to be successful?

---

Documentation of Flexibilities Extended



# Common Areas of Flexibility



**Standard 4.3 –  
ROMA**



**Community  
Assessment  
Standards**



**Board Standards  
(esp. items  
requiring board  
approval)**

# Table Discussion

At your tables, discuss the common flexibilities you offer within your state and processes.

Consider your goals in assessing Organizational Standards, and identify practices that support those goals.



# Guidance Goes a Long Way...

- Providing clear guidance in advance helps to ensure agencies know what is expected for Organizational Standards Monitoring
- Be mindful not to get too narrow/prescriptive when providing guidance
- Build flexibilities into guidance

# Building Resilient Guidance

- Resilient guidance builds flexibilities into your practice
  - Broadest interpretation of what constitutes “meeting” a Standard
  - Giving multiple options for documentation
  - Standard operating procedure for when specific flexibilities are activated or for requesting flexibilities



# Flexibility Doesn't Negate the Need for T/TA or Policy

If there are common areas that agencies require flexibility, consider:

- Is T/TA needed or appropriate?
- Is the policy clear?
  - For CAAs?
  - For Monitors?

Unsure? Talk to the Network!



# Reflection

**What is one thing that you heard that you will take back to your state office?**



# RESOURCES

# CSBG ORGANIZATIONAL STANDARDS

## A Brief History...



## What are the CSBG Organizational Standards?

The **CSBG Organizational Standards** are a comprehensive set of standards developed with input from the entire CSBG Network through a three-year multi phase process led by the Center of Excellence. The Organizational Standards were announced in January 2015 with the OCS release of **IM 138, State Establishment of Organizational Standards for CSBG Eligible Entities**, directing States to establish organizational standards by fiscal year 2016.

The Organizational Standards are organized in three thematic groups comprising nine categories and totals of 58 standards for private, nonprofit entities and 50 for public entities. The purpose of the organizational standards is to ensure that all agencies have appropriate organizational capacity, in both critical financial and administrative areas, as well as areas of unique importance to the mission of the Community Action network.

<https://communityactionpartnership.com/organizational-standards/>



COMMUNITY ACTION ACADEMY

# Overview of the CSBG Organizational Standards eCourse

## Introduction

Oct, 2012

The Organizational Standards Center of Excellence is Established  
Launched by the National Community Action Partnership



Jul, 2013

The C.O.E. submits first draft of Organizational Standards to OCS  
after a 9 month process of listening sessions, literature reviews, surveys, and field testing



Mar, 2014

OCS publishes draft I.M. with proposed Standards  
Developed from Center of Excellence Draft, included an open comment period for additional input from network



Jan, 2015

OCS releases IM 138, formally establishing the CSBG Organizational Standards



## Quiz



CSBG Organizational Standards Mini Quiz



**WIPFLI** LLP  
CPAs and Consultants

## Course Completion Certificate



Overview of the C

administrative areas, as well

IM 138, State Establishment  
CSBG Act, 42 U.S.C. § 9914

View the: [CSBG Organizational Standards](#)

In 2012, the National Community Action Partnership, with support from the Office of Management and Enterprise Services, launched a broader effort to enhance

Category Four

## CSBG Org Standards Organizational Leadership (cont.)

4.5 – (private) –  
Governing body-  
approved written  
succession plan for  
CEO/ED, including  
procedures for  
absence of 3 mos. or  
less and process for  
filling permanent  
vacancies

4.5 - (public) –  
Adhere to local  
policies and  
procedures regarding  
interim appointments  
and permanent  
vacancies

<https://moodle.communityactionpartnership.com/course/view.php?id=68>

# Organizational Standards Related Webinars

- Nine webinar series on the Organizational Standards
- Four webinar series on both Community Needs Assessments and Strategic Planning
- Two webinar series on Succession Planning
- Peer-to-Peer series on scorecards, data collection and Head Start integration

## Planning for a Comprehensive Needs Assessment

by Community Action Partnership | Nov 2, 2017 | Community Needs Assessment, Management & Operations |

**ROMA and the CNA**  
Planning for a Comprehensive Community Needs Assessment

- Assessment is the first stage of the ROMA cycle and helps determine:
  - Who are our customers?
  - What do they value?
  - What outcomes should we aim to achieve?
- Assessment is the foundation of all subsequent phases
- Assessment is an ongoing process

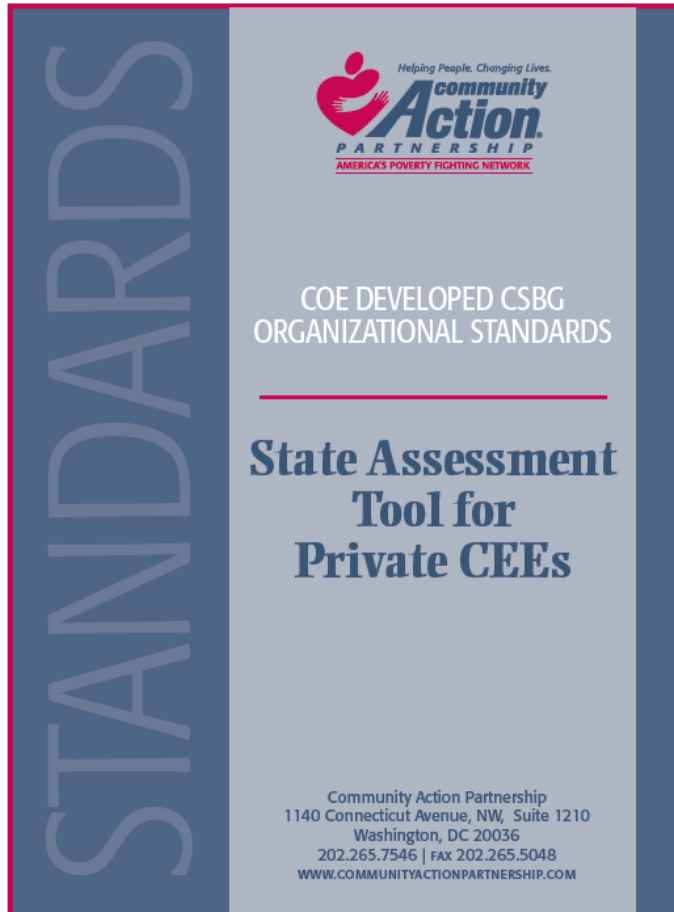
```
graph TD; Assessment[Assessment: Community needs and resources, agency data] --> Planning[Planning: Use agency mission statement and assessment data to identify results and strategies]; Planning --> Implementation[Implementation: Services and strategies produce results]; Implementation --> Achievement[Achievement of Results: Observe and report progress]; Achievement --> Assessment;
```

### Download Slides

This is the first session of four part webinar series offering a deep dive into the community needs assessment process – from planning for a comprehensive, agency-wide needs assessment, to the research, analysis, and communication of the assessment. This session focuses on planning the comprehensive needs assessment.



# Tools to Help Assess



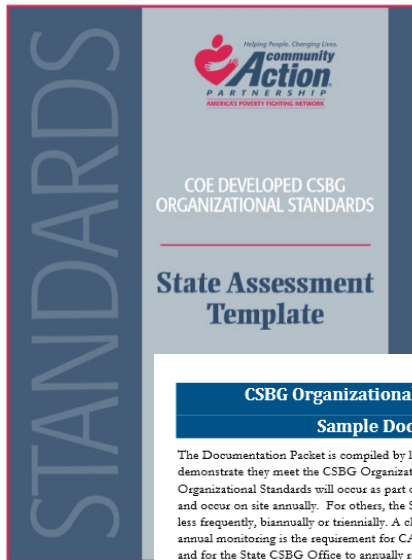
- Assessment Tool
- Separate Tools for States and CAAs
- Separate Tool for Private and Public CAA State Assessments
- Includes Final COE-Developed Standards Language
- COE Guidance

# Assessment Template

States and CAAs

Summary Sheet

Documentation Packet



COE DEVELOPED CSBG  
ORGANIZATIONAL STANDARDS

## State Assessment Template

### CSBG Organizational Standards-Self Assessment

#### Sample Documentation Packet

The Documentation Packet is compiled by local CAAs as they collect information annually to demonstrate they meet the CSBG Organizational Standards. For many CAAs, the assessment of Organizational Standards will occur as part of regular monitoring by the State CSBG Lead Agency and occur on site annually. For others, the State CSBG lead Agency conducts on site monitoring less frequently, biannually or triennially. A challenge for States and CAAs that do not conduct annual monitoring is the requirement for CAAs to demonstrate they meet the Standards annually and for the State CSBG Office to annually report the number of CAAs meeting Standards.

To meet this challenge, CAAs and State CSBG Lead Agencies will develop a process that meets the needs in that State. Tools and resources are available from the Organizational Standards Center of Excellence (OSCOE) to assist CAAs and States to meet this challenge in ways that are not overly burdensome. This tool focuses on capturing and filing the documentation necessary to demonstrate how a CAA meets each Standard. This tool and others can be found at [www.communityactionpartnership.com](http://www.communityactionpartnership.com).

CAAs will need to demonstrate they meet all Standards annually. Many individual Standards require action on an annual basis, while others do so on a biannual, triennial, or even five year span. There will be materials local CAAs will need to collect that may not change over a five year period (e.g. bylaws, strategic plan). In addition, there will be documents that will need to be collected that may be created monthly (e.g. board minutes). There are certain documents that will be used to demonstrate the CAA meets multiple Standards. This tool is provided to be a guide to help CAAs and State CSBG Lead Agencies think about how to collect, store, and report needed materials over time, limiting duplication of effort. It frames the collection of materials under the title of "Documentation Packet".

A CAA's Documentation Packet may be:

- **Hard copy or electronic (or a blend).** Some CAAs may prefer to have a binder, file folder, banker's box, or other hard copy system for collecting and storing the documents. Others may prefer electronic documents. In some cases, CAAs may use a mix of both options.
- **Stored at the CAA, State CSBG Lead Agency, in the "cloud", on in some other document sharing environment;** Depending on the system established, the Documentation Packet may be stored at the CAA for access during onsite monitoring, at the State Office for desk audits, or in an online file sharing/storage system accessible to both and even perhaps third parties.
- **Formally updated periodically or as part of the annual assessment process.** Some CAAs may choose to update the Documentation Packet monthly as new materials are developed or may choose to select a single time each year they update the packet.
- **Spread across multiple years.** Some documents may be submitted in the initial Documentation Packet and may not need to be updated for two to four years. CAAs and

### SAMPLE Table of Contents (EACH CAA's TABLE OF CONTENTS WILL VARY)

A. Check Off List of items on File with State CSBG Office	#
B. Relevant Portions of Board Approved Strategic Plan	#
C. Additional Strategic Planning Documents	#
a. Committee Meeting Minutes/Notes	#
b. Summaries of Focus Groups/Surveys	#
D. Relevant Portions of Community Needs Assessment	#
a. Additional Community Needs Assessment Documents	#
E. Relevant Board Minutes/Sections	#

Date of Assessment \_\_\_\_\_

Agency Name \_\_\_\_\_

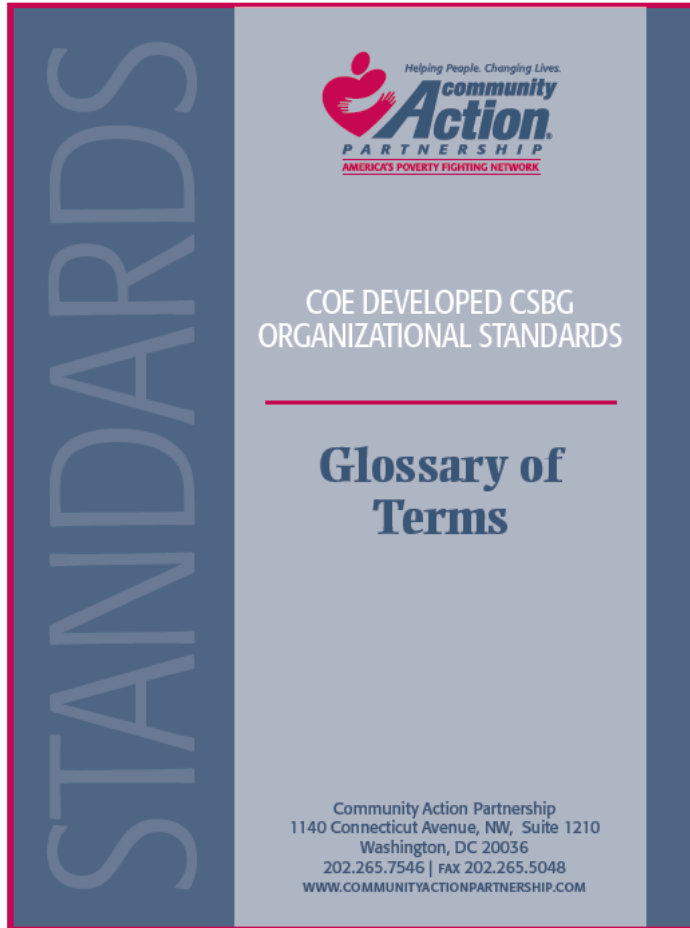
### Section 1: CSBG Organizational Standards Which Need to Be Documented as Met Annually

Standard Number	Standard	Standard Category	CAA Assessment Met <input checked="" type="checkbox"/>	CAA Assessment Not Met <input checked="" type="checkbox"/>	Documentation Packet Page Number(s)	State's Assessment Agrees with CAA's Y/N	Notes
1.1	The organization demonstrates low-income individuals' participation in its activities.	Consumer Input and Involvement					
1.3	The organization has a systematic approach for collecting, analyzing, and reporting customer satisfaction data to the governing board.	Consumer Input and Involvement					
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.	Community Engagement					
2.3	The organization communicates its activities and its results to the community.	Community Engagement					
2.4	The organization documents the number of volunteers and hours mobilized in support of its activities.	Community Engagement					
4.2	The organization's Community Action plan is outcome-based, anti-poverty focused, and ties directly to the community assessment.	Leadership					

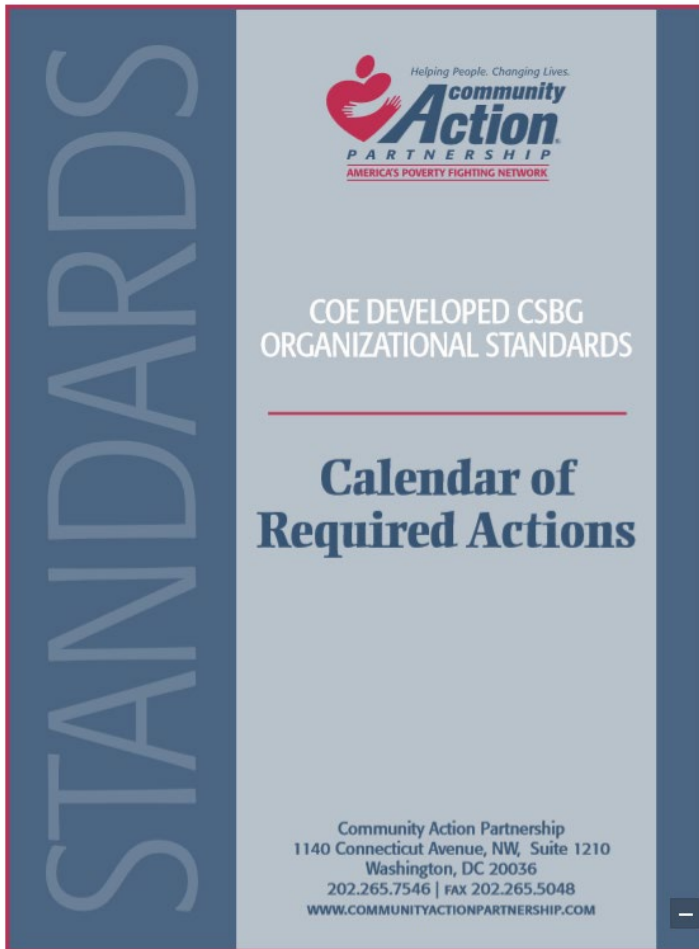
# Tools to Help Assess

## Glossary of Terms

This glossary is provided as guidance by the Organizational Standards Center of Excellence (OSCOE). It is intended to provide some clarity as to the intent of the CSBG Working Group in the development of the Standards. Please note that this is not official guidance and CAAs and State CSBG Offices are encouraged to work together to come to agreement on definitions and to refer to the CSBG Act and Office of Community Services' Information Memoranda when needed.

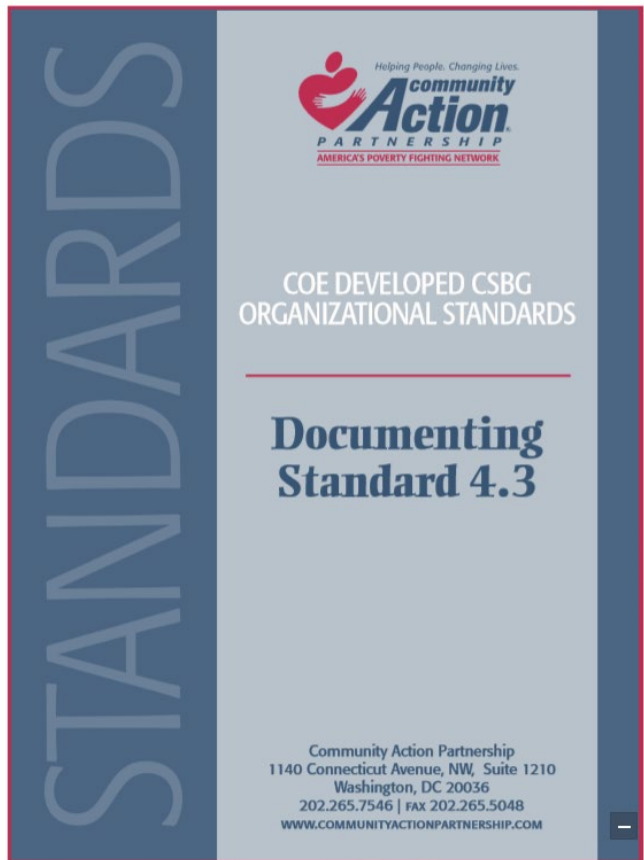


# Calendar of Required Actions



- Annually
- Every 2 Years
- Every 3 Years
- Every 5 Years
- Documentation

# Standard 4.3 Document Use of Certified ROMA Trainer

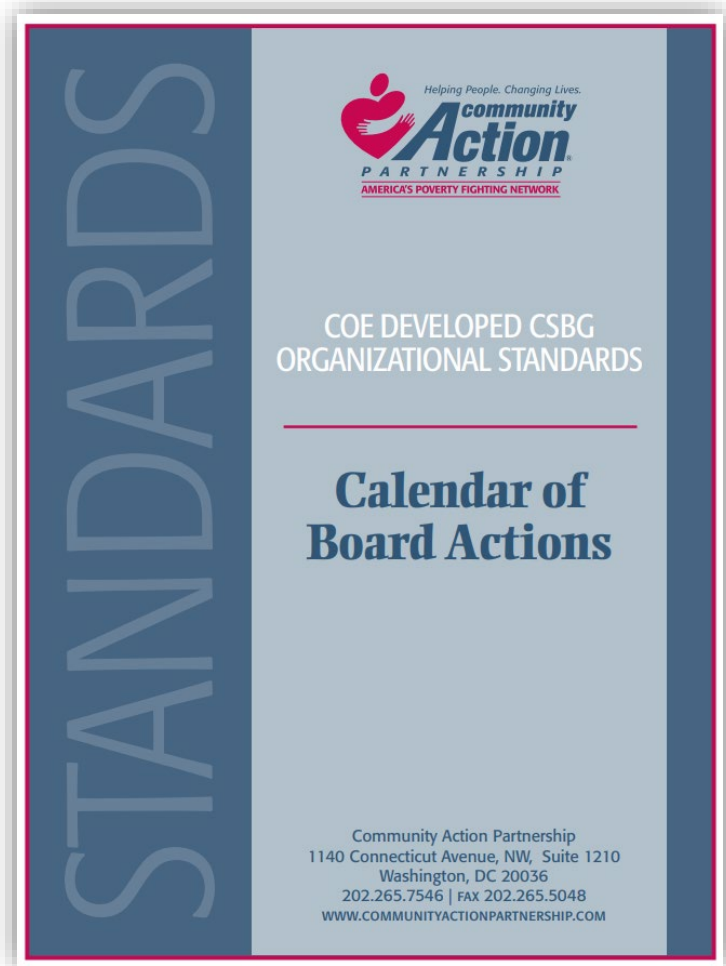


- Intent: Nationally Certified ROMA Trainer
- Use of “Equivalent” intended for States that have selected a performance management system other than ROMA

# Calendar of Activities

- The Organizational Standards have several requirements for boards that happen on different time cycles—use our Calendar of Activities to help manage requirements

[https://communityactionpartnership.com/wp-content/uploads/2018/08/29\\_Schedule-for-Boards\\_Final-Fillable.pdf](https://communityactionpartnership.com/wp-content/uploads/2018/08/29_Schedule-for-Boards_Final-Fillable.pdf)





# T/A Guides Toolkits and Webinars for Each of the Nine Categories

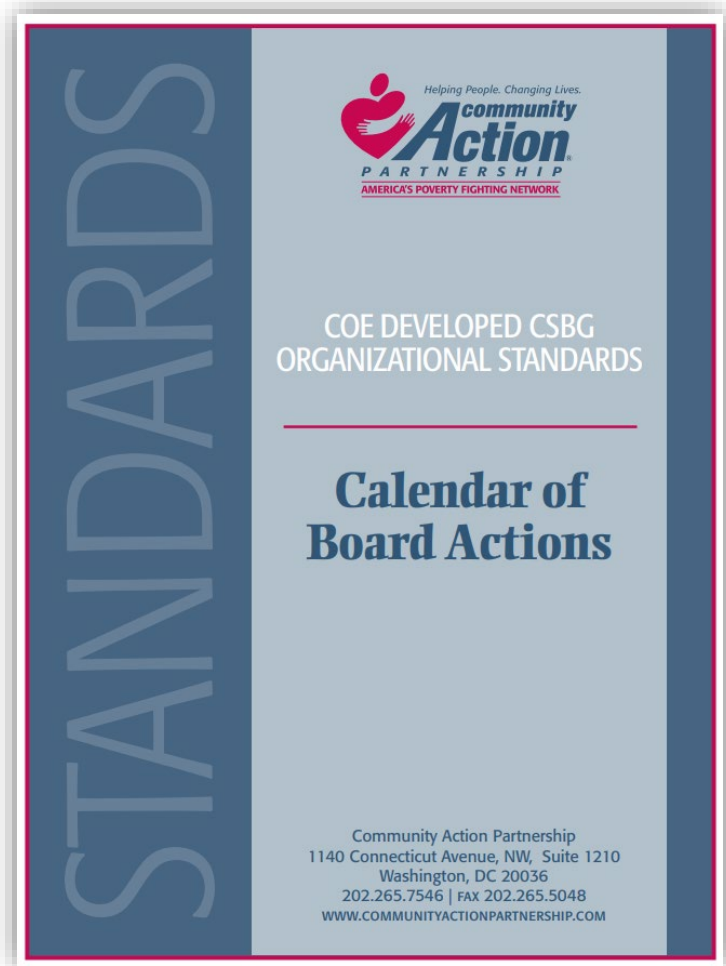
- Additional Guidance
  - Definition
  - Compliance
  - Document
- Beyond Compliance
- Resources
- Assessment Scales



# Calendar of Activities

- The Organizational Standards have several requirements for boards that happen on different time cycles—use our Calendar of Activities to help manage requirements

[https://communityactionpartnership.com/wp-content/uploads/2018/08/29\\_Schedule-for-Boards\\_Final-Fillable.pdf](https://communityactionpartnership.com/wp-content/uploads/2018/08/29_Schedule-for-Boards_Final-Fillable.pdf)



# Raising the Low-Income Voice: Case Studies in Democratic Selection Procedures

- Seek applicants through social media, word of mouth, civic/community involvement and other entities that serve low-income population.
- Qualified applicant(s) is/are elected by low-income population in service area.
- Ballot election is held:
  - » In Community Services Department
  - » During high volume service time
  - » Bio for applicant available during the election process
  - » Educate voting participants in person and in written document as to the need for low income Board representation
  - » Voter sign in sheet
  - » Ballots are tallied when election is complete
  - » Hold orientation for newly elected Board member before the next scheduled Board of Director' meeting
- Outcome of election is presented to Board of Directors for approval at the next scheduled meeting
- Ballots/Voter sign in sheet retained in Board Minutes permanent record



## Raising the Low-Income Voice

Case Studies in Democratic Selection Procedures

### INTRODUCTION

*Updated April 2021*

Since the inception of the Economic Opportunity Act, a fundamental goal of Community Action has been to provide low-income individuals with a voice in the administration of its poverty-alleviating programs. With the Community Services Block Grant (CSBG) Act's call to achieve "maximum participation" of the low-income community in the development, planning, implementation, and evaluation of CSBG-funded programs, a critical venue for the low-income community's participation is their representation on the tripartite board.

Despite the importance placed on maximum participation of the low-income community,

such as election to a position of responsibility in another significant service or community organization such as a school PTA, a faith-based organization leadership group; or an advisory board/governing council to another low-income service provider."

IM 82 advises CAAs to ensure democratic selection procedures "directly through election [or] public form," but if that is not possible, it lists a number of alternatives. The case studies in Raising the Low-Income Voice are focused on the "direct" democratic procedures. If a CAA determines that direct democratic procedures are not possible, it will likely be able to comply with the law by creating what may be called

[https://www.capl原因.org/resources/PublicationDocuments/CAPLAW\\_RaisingtheLowIncomeVoice\\_Introduction\\_April2021.pdf](https://www.capl原因.org/resources/PublicationDocuments/CAPLAW_RaisingtheLowIncomeVoice_Introduction_April2021.pdf)



## CAA Board Meetings: Template Meeting Minutes and Index of Form Resolutions

### Introduction

Community action agency (CAA) boards perform vital governance and oversight functions for their organizations. Nowhere is this more evident than at board meetings, where board members hear reports, deliberate, and make decisions that guide organizational efforts. Meetings are the main venue where board members fulfill their fiduciary duties of care and loyalty to the organization. The duty of care is a legal obligation to act diligently in service of the organization, to be informed about the issues that impact the board's oversight of the organization, and to actively participate in discussions and decision-making. The duty of loyalty requires that when engaged in board business, members place the interests of the organization above their own personal interests.

**Board meeting minutes**, the written record of what happens at a board meeting, serve as critical evidence of board members' exercise of their fiduciary duties, since they describe key items presented and discussed by directors at the board meeting. They also help to show that the board considered the best interests of the organization and observed its conflict of interest policy. The decisions made and official actions taken at a board meeting are reflected in written **board resolutions**, which are typically incorporated into the meeting minutes and, in some cases, also kept separately for reference purposes. Meeting minutes and resolutions are important indicators to the general public, funding sources, and federal and state regulators that a CAA has maintained compliance with applicable laws and regulations. This includes the CSBG Organizational Standards, which require CAA boards to take certain actions in their organizational leadership and governance functions. Meeting minutes and resolutions are also an important resource for the CAA board itself: a continuous, contemporaneous record of where the board has been, where it is, and where it is going.

Given the importance of these documents, CAPLAW has created this resource to help board members and the staff who work with them create effective meeting minutes and resolutions. As discussed below, minutes and resolutions vary greatly in their degree of formality and detail. We encourage you to customize the templates we have provided to reflect the way your CAA operates, focusing on the function of each document rather than its form. Remember that meeting minutes and resolutions are just two tools in your agency's toolbox for documenting compliance with the CSBG Organizational Standards and other applicable laws. Formal board action is not necessary for compliance with most of the Organizational Standards, but where it is, we hope this resource will be helpful.

# Template Meeting Minutes and Index of Form Resolutions Resource

## 2-part template:

- Board meeting minutes
- Index of board resolutions

Available on the CAPLAW website:

<https://resources.capl原因.org/resources/template-meeting-minutes-and-index-of-form-resolutions/>



# All A-Board! Board Training Videos







# Thank You!

**Contact us at any time!**

**Hugh Poole | CSBG Director  
NASCS**

[hpoole@communityactionpartnership.com](mailto:hpoole@communityactionpartnership.com)

**Maribeth Schneber-Rhemrev | Director, Organizational Capacity Building  
National Community Action Partnership**

[Mschneberrhemrev@communityactionpartnership.com](mailto:Mschneberrhemrev@communityactionpartnership.com)



Scan here to  
complete the  
evaluation for  
this session!

