CSBG Organizational Standards: Are You Ready?

Tools and Resources for Implementation

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Presented by:

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Agenda

• OCS Timeline *(as presented by Jeannie Chaffin at 2014 CAPLAW Conference) *
• Highlights of Draft IM on Standards Implementation
• Tools and Resources
• Next Steps
## CSBG Performance Management Timeline - DRAFT

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<thead>
<tr>
<th>CY 2014</th>
<th>CY 2015</th>
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<td>FY 2014</td>
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<td>Final IM</td>
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<td>State Planning / Official Establishment</td>
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<td>FY 2016 Implementation Baseline Year for Reporting</td>
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### Organizational Standards
- **FY 2014**: Final IM
- **FY 2015**: State Planning / Official Establishment
- **FY 2016**: FY 2016 Implementation Baseline Year for Reporting
- **FY 2017**: Reporting ongoing

### Federal/State Accountability Measures
- **FY 2014**: Draft & Final IM
- **FY 2015**: State Planning / Federal Planning
- **FY 2016**: FY 2016 Implementation Baseline Year for Reporting
- **FY 2017**: Reporting ongoing

### Model State & Tribal Plans
- **FY 2014**: Revision
- **FY 2015**: OMB clearance
- **FY 2016**: Used for FY 2016 applications and ongoing
- **FY 2017**: Applications ongoing

### Annual Report Outcome Measures (ROMA/NPIs)
- **FY 2014**: Development
- **FY 2015**: Draft & Final IM
- **FY 2016**: State Planning
- **FY 2017**: FY 2017 Implementation Baseline Year for Reporting

### OMB clearance
- **FY 2015**: OMB clearance
Standards Overview

• Final IM on implementation due out this fall
• Many states and CAA’s are moving forward now in anticipation of final Standards
• Summer of 2015 - State Plans will need to address Standards
• FY 2016 - All States will implement Standards
• Implementation will impact State Plan, Monitoring and Annual Report
• States will need to identify Standards used:
  – COE Developed
  – COE Modified
  – State alternative Standards
Center of Excellence Submission to OCS

• Four Part Document
  – Executive Summary
  – History, Background and Process
  – Implementation Recommendations and Framework
  – 56 Organizational Standards (Private Agency & Public Standards)

• www.communityactionpartnership.com
Draft IM – Summary-Move Quickly

• “OCS expects States to **report on** the establishment and implementation of organizational standards, no later than **Fiscal Year 2016, in coordination with the local eligible entities**, in order to increase accountability for CSBG-eligible entities”

• “All State CSBG Lead Agencies are **strongly encouraged** to review the COE developed standards and **proceed immediately with plans to coordinate with partners in the State** on the establishment and implementation of organizational standards”
Draft IM – Summary-If Not These, Then…

• “If a State establishes a different set of organizational standards, the standards must encompass requirements of the CSBG Act and other Federal requirements, such as those found in the relevant OMB Circulars, and will be subject to OCS review during the application review process. States must ensure that these alternative organizational standards are at least as rigorous and comprehensive as the COE-developed organizational standards.”

• “OCS will implement new procedures for State reporting on organizational standards in upcoming CSBG Plans and CSBG Annual Reports.”
Draft IM – State Authority and Responsibility

• “In order to meet CSBG Act State responsibilities, all State CSBG Lead Agencies must establish and communicate standards and requirements to eligible entities.

• **The 9 critical areas for organizational standards are based on the requirements of the CSBG Act and the values of Community Action and include:** consumer input and involvement; community engagement; community assessment; organizational leadership; board governance; strategic planning; human resource management; financial operations and oversight; and data and analysis.”
• Alternative standards will be subject to OCS review during the application review process.”
Draft IM – OCS Expectations

• Fair & Reasonable Process
  – Whether States elect to use the COE-developed organizational standards or a different set, they should allow for input from the board and leadership of eligible entities on the timing and procedures for implementing, documenting, and reporting on the standards.

• Consistency with CSBG Act
  – States have authority to supplement the COE-developed organizational standards, provided that additions or changes are implemented in a manner consistent with the CSBG Act and other applicable Federal and State requirements.
Draft IM – OCS Expectations

• Clear, Consistent Monitoring Activities
  – Organizational standards should be clearly communicated prior to State monitoring activities, and consistently reiterated in State CSBG plans, contracts with eligible entities, funding documents, monitoring instruments, and monitoring reports.”

• Transparent Modification Process
  – Once established, a State’s organizational standards should only be modified based on established State rules and procedures that are publicly communicated and transparent.
Draft IM – Monitoring, Corrective Action, Reduction of Funding and Termination

• States monitor whether an eligible entity meets established goals, standards, and requirements. If, as a result, State determines that an eligible entity has deficiencies, then State must assess next steps:
  – Assess whether technical assistance is warranted
  – Provide the needed training and technical assistance
  – Require corrective action based on a QIP.

• “Failure to meet multiple requirements or standards may reflect widespread or systemic issues that cannot feasibly be corrected within a reasonable time frame. In such cases, States must assess whether additional actions are necessary, including reduction or termination of funding.”

• “States may reduce funding or terminate eligibility for CSBG funding when an eligible entity fails to: 1) comply with the terms of an agreement or State plan; 2) provide services; or 3) meet appropriate standards, goals, and other requirements established by the State, including performance objectives.”
Draft IM – Monitoring, Corrective Action, Reduction of Funding and Termination

• “Clear instances or organizational fraud, systemic abuse of funds, or criminal activity may be considered as cause for an immediate hearing on termination without the opportunity for training, technical assistance, or corrective action. However, **failure to meet a single requirement or standard may more appropriately result in technical assistance or renegotiation of future performance goals.**”

• State CSBG agency **must comply** with requirements as outlined in **IM 116** for terminating organizational eligibility or otherwise reducing the share of funding.
Draft IM - Boards

• “The primary responsibility of the board is to assure that the eligible entity not only meets all Federal and State requirements, but also provides high quality services to low income people and the community served. Board members serve to protect the interests of the low-income community by making sure the eligible entity has the capacity to be successful.”

• “Eligible entity boards must look beyond basic compliance to assure that the organization meets high standards of quality, accountability, and effectiveness. Therefore the organizational standards established by States should provide one basis for board review of the organization but the board must also use other accountability and oversight tools.”
Sample Oversight Tool for Boards

### Risk Assessment Checklist
(This sample document courtesy of Human Development Commission, Caro, MI)

Date Presented to HDC Board of Directors _____________

<table>
<thead>
<tr>
<th>Item</th>
<th>Year Reviewed</th>
<th>In Compliance</th>
<th>Non-Compliance</th>
<th>Concerns/Actions Steps</th>
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<tbody>
<tr>
<td><strong>A. Corporate Documents</strong></td>
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<tr>
<td>1. Articles of Incorporation</td>
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<td>2. Bylaws/Amendments-reviewed by attorney</td>
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<td>3. Minutes Board of Director meetings for past two years</td>
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<td>4. List of officers and Board membership, membership</td>
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<td>representation, and terms of office</td>
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<tr>
<td>5. Board Conflict of Interest Policy/Debarment Form Signed by</td>
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<td>members within the last two years</td>
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<tr>
<td>6. Annual Meeting and election of officers</td>
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<td>7. Maintain Advisory Council Minutes</td>
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Draft IM – State Reporting on Organizational Standards

• Upcoming submissions of State CSBG plans will require a description of standards.
  – If **using** COE developed standards, will be asked to describe a timeline for implementation, and process for input and reporting from eligible entities and other stakeholders
  – If **not using** COE developed standards, will be required 1) to explain reason for using alternative standards; 2) describe alternative standards, timeline, and reporting procedures; 3) ensure that alternative standards are at least as rigorous and comprehensive

• “OCS will ask all States to **explain and address the absence of any standards** related to the following critical areas:
  – consumer input and involvement; community engagement; community assessment; organizational leadership; board governance; strategic planning; human resource management; financial operations and oversight; and data and analysis”
Roll Out

• Final IM – expected by Fall 2014
• Planning for State Plan Implementation – FY 2015
• OMB Clearance Process
• Baseline Year – FY 2016
• Reporting – After FY 2016 Performance Period (March, 2017)
OMB Clearance Process for Model State Plan

• Process (6 – 9 Months)

• Public Comment Period

• Not Clearing Specific Organizational Standards
How Can CAAs, Associations, and State CSBG Offices Prepare?

• Keep lines of communication open between State CSBG Offices, CAAs, and State Associations

• CAAs - establish Staff Committee to assess the CAA against the proposed Organizational Standards and develop plan of action
  – Department Heads, Fiscal, HR, Planning, etc.
  – Keep Board of Directors informed of efforts through formal reporting
  – Develop spreadsheet to track results of internal assessment

• Include the Standards in organizational and department strategic planning discussions and work plans

• Work with your State Association to inform and train CAAs in your state on Standards

• Review State Plans and CAA Contracts for where Standards language will be appropriate to include

• Assess current state rules and regulations for needed changes
How is the Partnership assisting the Network?

• Re-Convened CSBG Working Group
  – Glossary
  – Videos for each of the 9 critical areas, including introduction and accompanying PowerPoint
  – Videos are an excellent tool for board and staff retreats
• Developing 2 Page Summary on Role of Board
• “Implementing Standards for States” Learning Community
• Dissemination of tools from CA peers
Internal Assessment Tracking Tool

-Sample-
Tools Available to Assist CAAs Meet the Standards
# CAPLAW TOOL

## TOOLS FOR TOP-NOTCH CAAs: A PRACTICAL APPROACH TO GOVERNANCE AND FINANCIAL EXCELLENCE

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<td>Section 5: Dealing with Conflicts of Interest</td>
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ONLINE TOOLS . . . .

Click to access information and resources

Click on the logo above to be taken to the National Training Center’s Affiliates Page with the Nonprofit Risk Management Center. This will be your entry page to the various affiliate benefits provided to you through the NRMC and the Community Action Partnership’s National Training Center.

Affiliates have access to various discounted risk management resources as well as a customized risk management tool designed specifically for CSBG eligible entities. The tool may be accessed directly free of charge. The additional resources may be purchased at a discounted rate.

Need help accessing the Affiliate page? Contact us at TTAsupport@communityactionpartnership.com
National Risk Mitigation Center

• Toolkits
  – Cost Allocation
  – Time and Effort Reporting
  – Risk Assessment
  – Balanced Scorecard/Strategic Planning
  – Measuring Impact of Partnerships/Collaborations
  – Reading Your Audit
  – Online Community Action Needs Assessment Tool
  – Online Nonprofit Risk Management Center
  – Succession Planning/Executive Transition
  – CSBG Monitoring-IM-116
www.communityactionpartnership.com
CSBG T/TA Resource Center

- [www.csbgtta.org](http://www.csbgtta.org)
- Many more toolkits, webinars, and print resources
- Consultant Bank
- Training Calendar
- Discussion Forum
- Shared Calendar
- Individual registrations for Board and Staff
Where Does That Leave Us...

- Utilize abundance of tools currently available
- Be prepared to implement Standards as soon as possible
- Convene regular regional conference calls/meetings
- CAAs - Address any areas where your CAA fell short during internal assessment
- CAAs - Develop a formal plan to meet the Standards
- States - Assess current monitoring tools and identify where components need to be added; talk with Legal Departments and have language vetted in corporate documents as needed
- States - Take a close look at the State and Federal Accountability Measures to see where to invest now to firm up areas where your State may fall short
Community Action Partnership
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