



**Department of State**  
Community Services

# **ORGANIZATIONAL STANDARDS TRAINING SERIES**

JANUARY – FEBRUARY 2025

FEBRUARY 26, 2025

# Training Series Dates

## **History and How to Submit**

January 23, 2025 - 10 AM - 11:30 AM

## **Maximum Feasible Participation**

February 4, 2025 - 10 AM - 11:30 AM

## **Vision and Direction**

February 6, 2025 - 10 AM - 11:30 AM

## **Operations and Accountability: Financial**

February 11, 2025 - 10 AM - 11:30 AM

## **Operations and Accountability: HR and Data**

February 13, 2025 - 10 AM - 11:30 AM

**HOW DID WE GET  
HERE?**



## How did we get here?

- President Obama proposed cutting Community Action in his 2011 State of the Union address and called for greater program accountability in his proposed budget.  
"I've proposed cuts to things I care deeply about, like community action programs."
- To develop a coordinated response to the Administration, in April of 2011, a CSBG Working Group comprised of State CSBG Lead Agencies, Community Action State Associations and CSBG Eligible Entities was convened .

## How did we get here?

- The original CSBG Working Group worked throughout 2011 to develop proposed standards and an implementation framework that provided HHS/ACF/OCS with a preliminary model of how standards could be developed and used.
- In the spring of 2012, HHS/ACF/OCS issued a funding opportunity. The National Community Action Partnership (NCAP) secured the grant and the responsibility to formally coordinate the development of standards, an implementation framework, assessment tools, as well as training and technical assistance resources.

## How did we get here?

- With the support of OCS funding, NCAP launched the Organizational Standards Center of Excellence. The Center of Excellence led the network-wide effort to develop high-quality performance standards with the mission of ensuring all Community Action Agencies have the capacity to provide high-quality services to low-income individuals and communities.
- The CSBG Working Group was expanded from its original 20 members to over 50 individuals, with representation from State CSBG Lead Agencies, Community Action State Associations, CSBG-Eligible Entities, and the national CSBG partners (NASCS, CAPLAW and NCAF) as well as external content experts.

# **FIELD TESTING AND KEY CONSIDERATIONS**



# Field Testing

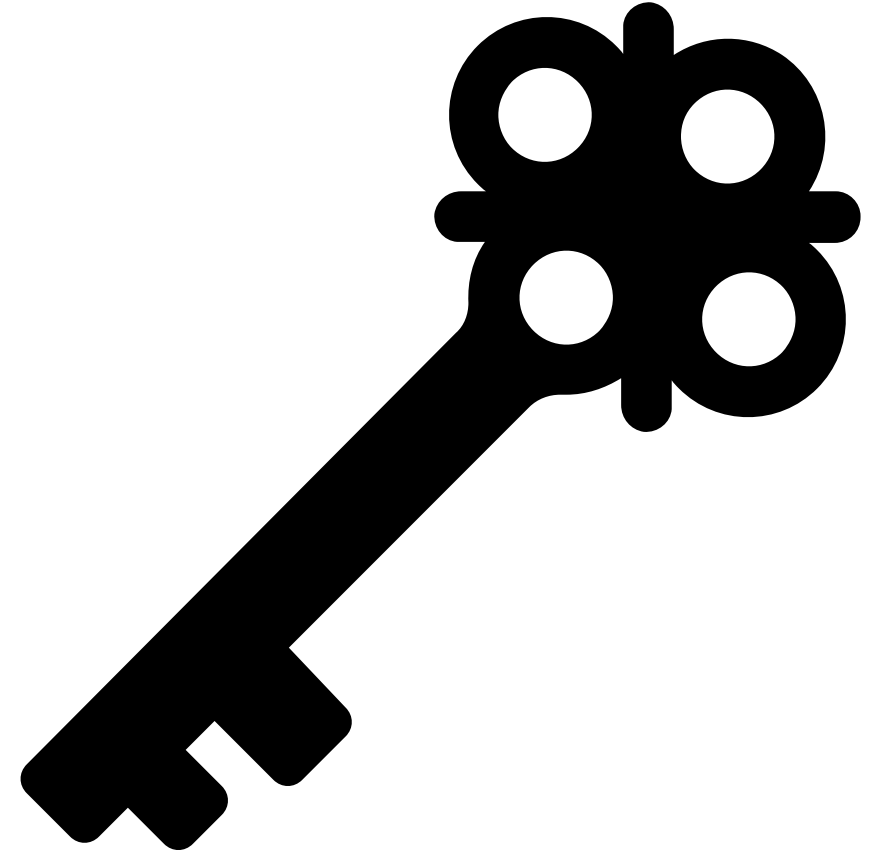
- In order to demonstrate whether the Standards would work in the field, NCAP conducted a pilot project in 11 states, with a total of 34 demographically-diverse local CAAs.
- The pilot project had three purposes:
  - Test the usability of the Standards in the field to determine whether each Standard was well-written, clear and specific.
  - To measure whether there was a consistent understanding of the Standards by States and CEEs.
  - Evaluate whether the draft tools provided for an accurate measure of whether an organization met or did not meet each Standard.

# Field Testing

- The information from the pilot showed which Standards were framed imprecisely, which resulted in differing interpretation of how to meet those Standards. It pointed out areas where Standards overlapped, leading to duplicative and unnecessary assessment. It also showed where additional guidance was needed to assure an even national implementation of the Standards.

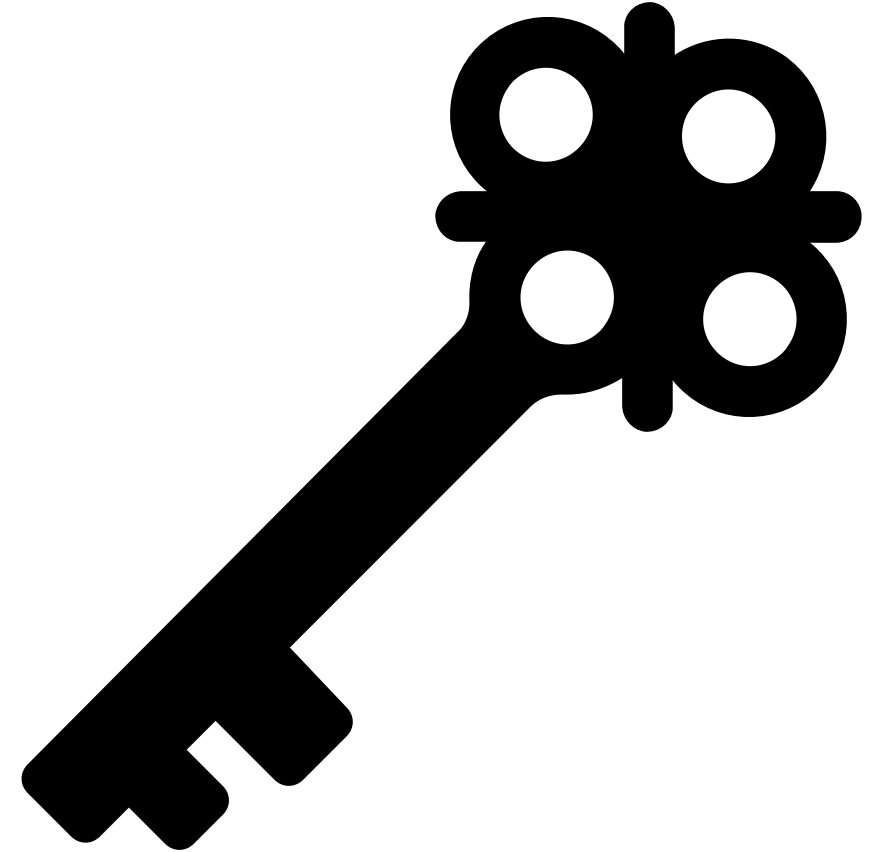
# Key Considerations

- Straightforward/Specific
- Limited Number
- Easily Measurable
- Balance Compliance Against High Performance Expectations
- Account for Network Diversity
  - Public/Private/Tribal/Limited-Purpose
  - Rural/Urban/Suburban



# Key Considerations

- Intended to be “Met/Not Met”
- Designed to create a consistent measure of quality across states and agencies
- Make clear Community Action’s longstanding commitment to accountability



# The Standards

- The Standards were submitted to the Office of Community Services (OCS) in July 2013.
- A Dear Colleague Letter was issued for comments/feedback from the Network.
- OCS accepted all Standards and added two for a total of 58 Standards.



# IMPLEMENTATION



# Implementation

- The Organizational Standards were announced in January 2015 with the OCS release of *IM 138, State Establishment of Organizational Standards for CSBG Eligible Entities*.
- The IM provides guidance and describes State and Federal roles and responsibilities for the establishment of organizational standards as a component of a larger performance management and accountability system for CSBG.
- States were directed to establish and report on the organizational standards for CSBG eligible entities no later than FY 2016.
- *“These standards will ensure CSBG eligible entities have appropriate organizational capacity to deliver services to low-income individuals and communities.”*

## IM 138

---

**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**

---

**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

# Performance Management and Accountability

## CSBG IM #144 State and Federal Accountability Measures and Data Collection Modernization

- OCS developed the State and Federal accountability measures, with guidance and assistance from the Urban Institute and in consultation with the CSBG Network.
- The State accountability measures capture performance data about the critical activities and functions performed at the State level. They indicate *how efficiently and effectively* a State implements the activities described in their State plan (monitoring, T/TA, distribution of funds), and *what impact* the State's efforts have on the performance of local eligible entities.
- The Federal measures address such efficiency and effectiveness characteristics as timeliness, accuracy, standards, and stakeholder satisfaction in the following critical activities such as state plan review, grant monitoring, and training and technical assistance.

# 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

# How to Submit Documentation

One of 3 ways to submit documentation:

1. Submit all documents in an electronic format (flash/USB/thumb drives).
2. Submit all documents in paper format (traditionally submitted in binders or folders)
3. **NEW IN FFY 2025:**  
Upload documents into the **DOS SharePoint site.**



# Dashboard

NEW YORK STATE

Microsoft 365

Search this site

Share

**TEST DASHBOARD - XYZ Community Action**

**DOS Contacts**

**Program Analyst**  
[daniel.mcdonough@dos.ny.gov](mailto:daniel.mcdonough@dos.ny.gov)

**Fiscal Field Representative**  
[craig.howard@dos.ny.gov](mailto:craig.howard@dos.ny.gov)

**Division of Community Services**  
[dos.sm.dcs@dos.ny.gov](mailto:dos.sm.dcs@dos.ny.gov)

**MWBE Mailbox**  
[dos.sm.mwbe@dos.ny.gov](mailto:dos.sm.mwbe@dos.ny.gov)



# Division of Community Services Document Portal

Share

## Department of State Website Links



CSBG Main Page



CSBG Advisory Council



CSBG Public Meetings



Reports, State Plans and Guides



CSBG Newsletters



CSBG Training Recordings

Reference links and Documents for Download here:

Upload HERE:

### Subrecipient Forms

See all

Edit in grid view Sync ... All Documents

### TEST EXT

See all

Name	Modified	Modified
TEST Organizational Standards & Indicators (ACROS, TRACS)	December 10, 2024	Eisner-M

# Subrecipient Library



Microsoft 365

Search this library



## Division of Community Services Document Portal

+ New

Upload

Edit in grid view

Sync



All Documents



[Return to classic SharePoint](#)

TEST EXT



Subrecipient Forms - for Download Only



✓ TEST EXT

Modified

Modified By

Created

Created By



TEST Organizational Standards & Indicators...

December 10, 2024

Eisner-Mix, Sayla (DOS)

December 10, 2024

Eisner-Mix, S



TEST Quarterly Reports

December 10, 2024

Eisner-Mix, Sayla (DOS)

December 10, 2024

Eisner-Mix, S

# Organizational Standards folders

NEW YORK STATE Microsoft 365 Search this library

Division of Community Services Document Portal

+ New Upload Edit in grid view Share Copy link Sync All Documents

Return to classic SharePoint

TEST EXT > TEST Organizational Standards & Indicators (ACROS, TRACS)

Name	Modified	Modified By	Created	Created By	+ Add
Category 0 - Grantee Profile & Reference D...	December 10, 2024	Eisner-Mix, Sayla (DOS)	December 10, 2024	Eisner-Mix, Sayla (DOS)	
Category 1 - Consumer Input and Involvem...	December 10, 2024	Eisner-Mix, Sayla (DOS)	December 10, 2024	Eisner-Mix, Sayla (DOS)	
Category 2 - Community Engagement	December 10, 2024	Eisner-Mix, Sayla (DOS)	December 10, 2024	Eisner-Mix, Sayla (DOS)	
Category 3 - Community Assessment	December 10, 2024	Eisner-Mix, Sayla (DOS)	December 10, 2024	Eisner-Mix, Sayla (DOS)	
Category 4 - Organizational Leadership	December 10, 2024	Eisner-Mix, Sayla (DOS)	December 10, 2024	Eisner-Mix, Sayla (DOS)	
Category 5 - Board Governance	December 10, 2024	Eisner-Mix, Sayla (DOS)	December 10, 2024	Eisner-Mix, Sayla (DOS)	
Category 6 - Strategic Planning	December 10, 2024	Eisner-Mix, Sayla (DOS)	December 10, 2024	Eisner-Mix, Sayla (DOS)	

# Organizational Standards subfolders


NEW YORK STATE Microsoft 365 Search this library

Division of Community Services Document Portal

+ New Upload Edit in grid view Share Copy link Sync All Documents

Return to classic SharePoint

TEST Organizational Standards & Indicators (ACROS, TRACS) > Category 0 - Grantee Profile & Reference Documents

Name	Modified	Modified By	Created	Created By	+ Add
 CNA May 2024.docx	December 16, 2024	Eisner-Mix, Sayla (DOS)	December 16, 2024	Eisner-Mix, Sayla (DOS)	

# Organizational Standards subfolders

The screenshot displays a Microsoft 365 SharePoint interface for the 'Division of Community Services Document Portal'. The top navigation bar includes the 'NEW YORK STATE' logo, 'Microsoft 365', and a search bar labeled 'Search this library'. The main header area shows the portal name and a search icon. Below the header is a ribbon with various actions: '+ New', 'Upload', 'Edit in grid view', 'Share', 'Copy link', 'Sync', 'Download', 'Export to Excel', 'Automate', and 'All Documents'. A left sidebar contains a 'Return to classic SharePoint' link. The main content area shows a breadcrumb path: 'TEST EXT > TEST Organizational Standards & Indicators (ACROS, TRACS) > Category 1 - Consumer Input and Involvement'. Below the breadcrumb is a table with columns for Name, Modified, Modified By, Created, and Created By. The table lists three subfolders: Standard 1.1, Standard 1.2, and Standard 1.3, all created and modified on December 10, 2024, by Eisner-Mix, Sayla (DOS).

Name	Modified	Modified By	Created	Created By
Standard 1.1	December 10, 2024	Eisner-Mix, Sayla (DOS)	December 10, 2024	Eisner-Mix, Sayla (DOS)
Standard 1.2	December 10, 2024	Eisner-Mix, Sayla (DOS)	December 10, 2024	Eisner-Mix, Sayla (DOS)
Standard 1.3	December 10, 2024	Eisner-Mix, Sayla (DOS)	December 10, 2024	Eisner-Mix, Sayla (DOS)

# Organizational Standards subfolders



Microsoft 365

Search this library



## Division of Community Services Document Portal

+ New

Upload

Edit in grid view

Share

Copy link

Sync



All Documents



Return to classic SharePoint

Category 1 - Consumer Input and Involvement > Standard 1.1

Name	Modified	Modified By	Created	Created By	+ Add c
1.1 Indicators(s) -TRACS only	December 10, 2024	Eisner-Mix, Sayla (DOS)	December 10, 2024	Eisner-Mix, Sayla (DOS)	
Standard 1.1.docx	December 19, 2024	Eisner-Mix, Sayla (DOS)	December 18, 2024	Shermer, Kerry (DOS)	
TEST DOCUMENT 123.docx	December 19, 2024	Eisner-Mix, Sayla (DOS)	December 19, 2024	Eisner-Mix, Sayla (DOS)	

# Organizational Standards subfolders

The screenshot shows a SharePoint document portal for the 'Division of Community Services'. The breadcrumb path is 'Category > Standard Involvement > Standard 1.3'. A dropdown menu is open under the 'New' button, showing 'Files' and 'Folder' options. Below the breadcrumb, a table lists items with columns for Name, Modified, Modified By, Created, and Created By.

Name	Modified	Modified By	Created	Created By
1.3 Indicator(s) -TRACS only	December 10, 2024	Eisner-Mix, Sayla (DOS)	December 10, 2024	Eisner-Mix, Sayla (DOS)

# Uploading documents

The screenshot displays the Microsoft 365 interface for the 'Division of Community Services Document Portal'. The top navigation bar includes the 'NEW YORK STATE' logo, 'Microsoft 365', and a search bar labeled 'Search this library'. Below the navigation bar, the page title is 'Division of Community Services Document Portal'. The main content area shows a breadcrumb trail: '... > Category Folder > and Involvement > Standard 1.3'. A toolbar at the top of the content area contains buttons for '+ New', 'Upload', 'Edit in grid view', 'Share', 'Copy link', 'Sync', and 'All Documents'. An 'Open' dialog box is overlaid on the page, showing a file list with columns for 'Name', 'Status', and 'Date modified'. The file list contains three items: 'FFY 2024 Q5 and Q6 PPR - Instructions' (Status: ✓, Date: 1/22/2025), 'CSBG Newsletter - November 2024' (Status: ✓, Date: 11/26/2024), and 'Blank 2025 GSCR' (Status: ✓, Date: 11/19/2024). The dialog box also features a 'File name' field, a file type dropdown set to 'All files', and buttons for 'Upload from mobile', 'Open', and 'Cancel'.

NEW YORK STATE

Microsoft 365

Search this library

Division of Community Services Document Portal

+ New Upload Edit in grid view Share Copy link Sync All Documents

Return to classic SharePoint

Files

... > Category Folder > and Involvement > Standard 1.3

Open

« OneDrive - New York State O... > 2 Upload to Website

Search 2 Upload to Website

Organize New folder

Name	Status	Date modified
FFY 2024 Q5 and Q6 PPR - Instructions	✓	1/22/2025 1
CSBG Newsletter - November 2024	✓	11/26/2024 3
Blank 2025 GSCR	✓	11/19/2024 1

File name: All files

Upload from mobile Open Cancel

# Uploading documents

The screenshot displays the Microsoft 365 interface for the "Division of Community Services Document Portal". The top navigation bar includes the New York State logo, the text "Microsoft 365", a search bar with the placeholder "Search this library", and icons for settings, help, and a user profile. Below the navigation bar, the page title "Division of Community Services Document Portal" is visible. The main content area shows a document library with a toolbar containing options like "New", "Upload", "Edit in grid view", "Share", "Copy link", and "All Documents". A notification box is overlaid on the library, stating: "CSBG ...4.pdf" is now available. Below the notification is a "Notify your team" button. The document library table below the notification contains the following data:

Name	Modified	Created By	Modified	Created By
CSBG Newsletter - November 2024.pdf	A few seconds ago	saymix	A few seconds ago	saymix
1.3 Indicator(s) -TRACS only	December 10, 2024	Eisner-Mix, Sayla (DOS)	December 10, 2024	Eisner-Mix, Sayla (DOS)

# Uploading documents- drag and drop

Microsoft 365

NEW YORK STATE

Division of Community Services Doc...

+ New Upload All Documents

Category 1 - Consumer Input and Involvement > Standard 1.3

Name	Modified	Modified E
1.3 Indicator(s) -TRACS only	December 10, 2024	Eisner-Mix, S
CSBG Newsletter - November 2024.pdf	5 minutes ago	saymix

2 Upload to SharePoint

File Home Share View Cloud Storage

OneDrive - New York State Office of Informatio... > 2 Upload to SharePoint

Name	Status	Date mo
<input checked="" type="checkbox"/> SharePoint FAQs for Subrecipients	✓	1/9/2021
<input type="checkbox"/> CSBG Newsletter - November 2024	✓	11/26/21
<input type="checkbox"/> DOS MEMO Income Eligibility for CSBG effective until 9.30.23	✓	2/8/2021
<input type="checkbox"/> NYSDOS DCS CSBG - Photo release and consent	✓	1/9/2021

4 items | 1 item selected | 155 KB | Available on this device

# Uploading documents- drag and drop

The screenshot shows the Microsoft 365 SharePoint interface. At the top, the 'NEW YORK STATE' logo is on the left, and 'Microsoft 365' is in the center. Below this is a header for 'Division of Community Services Doc...'. A navigation bar includes '+ New', 'Upload', and 'All Documents'. The main content area shows a breadcrumb path: 'Category 1 - Consumer Input and Involvement > Standard 1.3'. Below this is a table of documents with columns for Name, Modified, and Modified By.

Name	Modified	Modified By
SharePoint FAQs for Subrecipients.pdf	A few seconds ago	saymix
1.3 Indicator(s) -TRACS only	December 10, 2024	Eisner-Mix, S
CSBG Newsletter - November 2024.pdf	6 minutes ago	saymix

The screenshot shows a Windows File Explorer window titled '2 Upload to SharePoint'. The address bar indicates the location is 'OneDrive - New York State Office of Informatio...'. The main area displays a table of upload progress for four files.

Name	Status	Date modified
<input checked="" type="checkbox"/> SharePoint FAQs for Subrecipients	✓	1/9/2025
<input type="checkbox"/> CSBG Newsletter - November 2024	✓	11/26/20
<input type="checkbox"/> DOS MEMO Income Eligibility for CSBG effective until 9.30.23	✓	2/8/2023
<input type="checkbox"/> NYSDOS DCS CSBG - Photo release and consent	✓	1/9/2020

At the bottom, the status bar shows '4 items', '1 item selected', '155 KB', and 'Available on this device'.

# Organizational Standards folders

NEW YORK STATE

Microsoft 365

Search this library

Division of Community Services Document Portal

+ New Upload Edit in grid view Share Copy link Sync All Documents

Return to classic SharePoint

TEST EXT > TEST Organizational Standards & Indicators (ACROS, TRACS)

Name	Modified	Modified By	Created	Created By
Category 0 - Grantee Profile & Reference D...	December 10, 2024	Eisner-Mix, Sayla (DOS)	December 10, 2024	Eisner-Mix, Sayla (DOS)
Category 1 - Consumer Input and Involvem...	December 10, 2024	Eisner-Mix, Sayla (DOS)	December 10, 2024	Eisner-Mix, Sayla (DOS)
Category 2 - Community Engagement	December 10, 2024	Eisner-Mix, Sayla (DOS)	December 10, 2024	Eisner-Mix, Sayla (DOS)
Category 3 - Community Assessment	December 10, 2024	Eisner-Mix, Sayla (DOS)	December 10, 2024	Eisner-Mix, Sayla (DOS)
Category 4 - Organizational Leadership	December 10, 2024	Eisner-Mix, Sayla (DOS)	December 10, 2024	Eisner-Mix, Sayla (DOS)
Category 5 - Board Governance	December 10, 2024	Eisner-Mix, Sayla (DOS)	December 10, 2024	Eisner-Mix, Sayla (DOS)
Category 6 - Strategic Planning	December 10, 2024	Eisner-Mix, Sayla (DOS)	December 10, 2024	Eisner-Mix, Sayla (DOS)

# QUESTIONS



# Training Series Remaining Dates

## **Maximum Feasible Participation**

February 4, 2025 - 10 AM - 11:30 AM

## **Vision and Direction**

February 6, 2025 - 10 AM - 11:30 AM

## **Operations and Accountability: Financial**

February 11, 2025 - 10 AM - 11:30 AM

## **Operations and Accountability: HR and Data**

February 13, 2025 - 10 AM - 11:30 AM

**MAXIMUM  
FEASIBLE  
PARTICIPATION**



# 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

## Resources Referenced:

Community Action Partnership Technical Assistance Guides. There is a technical assistance guide for all nine categories (Public and Private).



# SELF-ASSESSMENT TOOL GUIDANCE

## Maximum Feasible Participation – Category 1: Consumer Input and Involvement

**Standard 1.1**      **The organization demonstrates low-income individuals' participation in its activities.**

**Guidance:**

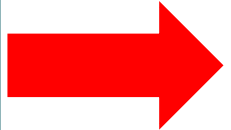
- This standard is meant to embody “maximum feasible participation”.
- The intent of this standard is to go beyond board membership; however, board participation may be counted toward meeting this standard if no other involvement is provided. The tripartite board is only one of many mechanisms through which Eligible Entities engage people with low-incomes.
- Participation can include activities such as Head Start Policy Council, tenant or neighborhood councils, and volunteering, etc.
- Though not mandatory, many Eligible Entities meet this standard by including advisory bodies to the board.

**Organization Self-Assessment:**

- Met
- Not Met

**Documentation Attached to Support the Standard  
(Check all that apply)**

- Advisory group documents
- Advisory group minutes
- Activity participation lists
- Board minutes
- Board pre-meeting materials/packet
- Volunteer lists and documents



**List Other Documentation Attached:**

# Maximum Feasible Participation

- The CSBG Act specifies that its goals are to be achieved through maximum participation of low-income people. It **“demands that those living in poverty should determine the programs that will help them the most.”**
- Maximum Feasible Participation is the **heartbeat of Community Action.**
- The statistical measure of your agency’s mission, vision, values, partnerships, services, and impact.
- In short, it’s how we measure our “why.”
- Categories 1-3 are easy to take for granted. Meet the standard by documenting your “why.”

# Category One: Consumer Input and Involvement

**Standard 1.1** • The organization demonstrates low-income individuals' participation in its activities.

## Guidance

- This standard is meant to embody “maximum feasible participation”.
- **The intent of this standard is to go beyond board membership;** however, board participation may be counted toward meeting this standard if no other involvement is provided. The tripartite board is only one of many mechanisms through which CEEs engage people with low-incomes.
- Participation can include activities such as Head Start Policy Council, tenant or neighborhood councils, and volunteering, etc.
- Though not mandatory, many CEEs meet this standard by including advisory bodies to the board.

# Category One: Consumer Input and Involvement

**Standard 1.2** • The organization analyzes information collected directly from low-income individuals as part of the Community Assessment.

## Guidance

- This standard reflects the need for CEEs to talk directly with low-income individuals regarding the needs in the community.
- Data can be collected through a variety of ways including, but not limited to, focus groups, interviews, community forums, customer surveys, etc.
- Analyzing the information can be met through review of the collected data by staff and/or board, including a review of collected data in the written community assessment, with notations of this review in the Assessment's Appendix, committee minutes, etc.

# Category One: Consumer Input and Involvement

**Standard 1.3** • The organization has a systematic approach for collecting, analyzing, and reporting customer satisfaction data to the governing board.

## Guidance

- This reflects the need for any business to gather information regarding customer satisfaction. All organizations need to be aware of how satisfied their customers are of the services they receive.
- This standard does not imply that a specific satisfaction level needs to be achieved.
- **Documentation is needed to demonstrate all three components in order to meet the standard: 1) collection, 2) analysis, and 3) reporting of data.** A systematic approach may include, but not be limited to, surveys or other tools being distributed to customers annually, quarterly, or at the point of service (or on a schedule that works for the individuation CEE). Such collection may occur by program or agency-wide at a point in time.
- Analyzing the findings is typically completed by staff. Reporting to the board may be via written or verbal formats.

## Category Two: Community Engagement

**Standard 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.

### Guidance

- Specifically identified purposes may include but are not limited to: shared projects; community collaborations/coalitions with an identified topic e.g. domestic violence, homelessness, teen pregnancy prevention, transportation task forces, community economic development projects, etc.; contractually coordinated services; etc.
- **The intent of this standard is not to have another list, but to have documentation that shows what these partnerships entail and/or achieve.**
- These could be documented through MOUs, contracts, agreements, documented outcomes, coalition membership, etc.
- **This standard does not require that every partnership is a formal, fully documented relationship.**

# Category Two: Community Engagement

**Standard 2.2** • The organization utilizes information gathered from key sectors of the community in assessing needs and resources, during the community assessment process or other times. These sectors would include at minimum: **community-based organizations, faith-based organizations, private sector, public sector, and educational institutions.**

## Guidance

- If gathered during the community assessment, it would be documented in the assessment. If done during “other times” this may be reflected in reports, data analysis, or staff/board meeting minutes.
- Engagement may include: key informant interviews, staff participation in other community groups/advisory bodies, community-wide processes, etc.
- Documentation is needed **to demonstrate that all five sectors have been engaged: community-based organizations, faith-based organizations, private sector, public sector, and educational institutions.** There is no requirement for how many individual organizations the CEE must contact, or what data is collected.
- If one or more of these sectors are not present in the community or refuse to participate, the CAA needs to demonstrate the gap or a good faith effort to engage the sector(s).
- Demonstrating that you have “gathered” and “used” the information may be met in a variety of ways including, but not limited to: summarizing the data in the community assessment or its appendices; documentation of phone calls, surveys interviews, focus groups in CAA files (hard copy or electronic); documentation in planning team minutes; summary reports on the data shared at board meetings or board committees; etc.

## Category Two: Community Engagement

**Standard 2.3** • The organization communicates its activities and its results to the community.

### Guidance

- This may be met through a CAA's annual report, social media activity, traditional news media, community outreach activities, etc.
- Community would be defined by the CAA but needs to include those outside of the staff and board of the CAA.

## Category Two: Community Engagement

**Standard 2.4** • The organization documents the number of volunteers and hours mobilized in support of its activities.

### Guidance

- There is no requirement to utilize volunteers, only to document their number and hours, if utilized.
- This information should already be collected as part of current National Performance Indicators.

## Category Three: Community Assessment

**Standard 3.1** • The organization conducted a Community Assessment and issued a report within the past **3 years**.

### Guidance

- This standard refers to what is sometimes called a community needs assessment, and requires that Eligible Entities assess both needs and resources in the community. The requirement for this assessment is outlined in the CSBG Act.
- This may require CSBG Lead Offices to adjust timeframes for required submission.
- The report may be electronic or print, and may be circulated as the eligible entity deems appropriate. This can include: websites, mail/email distribution, social media, press conference, etc.
- It may be helpful for Eligible Entities to document the report release date such as April 2022 or December 2023.

## Category Three: Community Assessment

**Standard 3.2** • As part of the Community Assessment, the organization collects and includes current data specific to poverty and its prevalence related to **gender, age, and race/ethnicity** for their service area(s).

### Guidance

- Documentation is needed to demonstrate all four categories—gender, age, race, and ethnicity—to meet the standard.
- Data on poverty is available from the U.S. Census Bureau.

## Category Three: Community Assessment

**Standard 3.3** • The organization collects and analyzes both qualitative and quantitative data on its geographic service area(s) in the Community Assessment.

### Guidance

- Documentation is needed to demonstrate that both types of data are collected in order to meet the Standard:
  - Qualitative: this is opinions, observations, and other descriptive information obtained from the community through surveys, focus groups, interviews, community forums, etc.
  - Quantitative: this is numeric information, e.g. Census data, program counts, demographic information, and other statistical sources.
- Documentation on data analysis is also required in order to meet the Standard

## Category Three: Community Assessment

**Standard 3.4** • The community assessment includes key findings on the causes and conditions of poverty and the needs of the communities assessed.

### Guidance

- There is no required way to reflect this information.
- The organization may choose to include a key findings section in the assessment report and/or executive summary.
- Conditions of poverty may include items such as: numbers of homeless, free and reduced school lunch statistics, SNAP participation rates, etc.
- Causes of poverty may include items such as: lack of living wage jobs, lack of affordable housing, low education attainment rates, etc.

## Category Three: Community Assessment

**Standard 3.5** • The governing board formally accepts the completed community assessment.

### Guidance

- This would be met through the Board voting on a motion to accept the assessment at a regular board meeting and documenting this in the minutes.

# QUESTIONS



# Training Series Remaining Dates

## **Maximum Feasible Participation**

February 4, 2025 - 10 AM - 11:30 AM

## **Vision and Direction**

February 6, 2025 - 10 AM - 11:30 AM

## **Operations and Accountability: Financial**

February 11, 2025 - 10 AM - 11:30 AM

## **Operations and Accountability: HR and Data**

February 13, 2025 - 10 AM - 11:30 AM

# VISION AND DIRECTION



## Category Four: Organizational Leadership

**Standard 4.1** • The governing board has reviewed the organization’s mission statement within the past 5 years and assured that:

1. The mission addresses poverty; and
2. The organization’s programs and services are in alignment with the mission.

### Guidance

- “Addresses poverty” does not require using the specific word poverty in the organization’s mission.
- Language such as but not limited to low-income, self-sufficiency, economic security, etc. is acceptable.
- It is the board that determines if the programs and services are in alignment with the mission. This review and formal determination would be recorded in the board minutes

# Category Four: Organizational Leadership

## Standard 4.1 • Resources

### Community Action Partnership's **Calendar of Board Actions**

- Link to calendar: [29 Schedule-for-Boards Final-Fillable.pdf](#)

### Community Action Partnership PowerPoint Presentation:

- [The Board's Role in Setting the Mission & Direction of the CAA](#)

## Category Four: Organizational Leadership

**Standard 4.2** • The organization's Community Action Plan is outcome-based, anti-poverty focused, and ties directly to the Community Assessment.

### Guidance

- The State Lead Agency is responsible for determining the plan's format and needs to ensure that the three components are readily identifiable.
- The plan needs to be focused on outcomes, i.e., changes in status (such as hunger alleviation vs. food baskets).
- The Community Action plan is sometimes referred to as the CSBG work plan.

# Category Four: Organizational Leadership

## Standard 4.2 • Resources

### NYS Department of State – Attachment C (also known as the Community Action Plan)

**ATTACHMENT C**  
COMMUNITY SERVICES BLOCK GRANT  
C-2c Work Plan and Program Progress Report (PPR)

Page \_\_\_\_\_ of \_\_\_\_\_  
*(Total Number of Pages should include C-2a, C-2b and C-2C)*

Contractor 0 FFY 2025 **Type (Work Plan, Amendment, PPR):**  
Please select one:

Budget Period 10/1/24 to 9/30/25 Contract # 0

**Description of Need (Family, Community, Agency)**  
Briefly identify the need that documents the reason for the programs/services/milestones and outcomes listed below. Corresponds to the needs/strategic objectives identified in Attachment C-1b Demonstrated Needs and Attachment C-1c Strategic Plan.

**Program that addresses the need described above:** \_\_\_\_\_ **ion (List Name of County):** \_\_\_\_\_

Interventions Very briefly describe the services, activities, and advocacy that will address the need and achieve the outcome.  <b>(Use service and strategy terminology from CSBG Annual Report Module 3 &amp; Module 4).</b>	Benchmarks or Milestones and Outcomes List the projected baseline number starting with the number seeking assistance followed by the number of customers to be enrolled. Then identify the expected benchmarks or milestones and outcomes to be achieved for the service or activity (Funnel). When possible, describe the service or outcome using language from the Individual and Family National Performance Indicators (FNPIs)/ Individual and Family Services (SRV) or from the Strategies and Community National Performance Indicators (CNPIs) (STRs).	NPI(s) or Service/ Capacity Codes	Method(s) of Measurement/Verification Identify the tool or process to be used to verify progress on the outcome or milestone.	Annual Target	PPR #1 Achieved	PPR #2 Achieved	PPR #3 Achieved	PPR #4 Achieved	YTD Total	YTD %
									0	#DIV/0!
									0	#DIV/0!
									0	#DIV/0!
									0	#DIV/0!
									0	#DIV/0!
									0	#DIV/0!
									0	#DIV/0!

## Category Four: Organizational Leadership

**Standard 4.3** • The organization'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 Organization documents having used the services of a ROMA certified trainer (or equivalent) to assist in implementation.

### Guidance

- There is no requirement to have a certified ROMA trainer on staff at the organization.
- While a ROMA trainer (or equivalent) must be involved, it is up to the organization to determine the manner in which this individual is utilized. Examples include involving the trainer in strategic planning meetings, consultation on implementation, etc.
- This includes involving a ROMA trainer (or equivalent) in ROMA-cycle activities such as community assessment, strategic planning, and data and analysis; it does not need to be a separate activity.

# Category Four: Organizational Leadership

## Standard 4.3 • Resources

**ATTACHMENT C**  
COMMUNITY SERVICES BLOCK GRANT  
**C-1a Needs Assessment**

Contractor \_\_\_\_\_ FFY 2025

Budget Period 10/1/24 to 9/30/25 Contract # \_\_\_\_\_

The CSBG statute 42 U.S.C. 9901 et seq., Section 676, (b), (11) and Public Law 105-285 states that "... the State will secure from each eligible entity in the State, as a condition to receipt of funding by the entity through a community services block grant made under this subtitle for a program, a community action plan (which shall be submitted to the Secretary, at the request of the Secretary, with the State plan) that includes a community-needs assessment for the community served, which may be coordinated with community-needs assessments conducted for other programs;"

**In compliance with the above, please provide the information below.**

1. Date of most recent needs assessment: \_\_\_\_\_
2. Describe the process used to conduct the assessment, including the involvement of low-income persons, the community served, agency staff members and the board of directors. If the community needs assessment process was conducted in collaboration with other community partners, fully identify those partners and their roles.

*[Note: to add a paragraph return in the space below, use 'Alt' and 'Enter']*

← ▶ C-1a Needs Assessment C-1b Demonstrated Needs C-1c Strategic Plan C-2a WP Capacity Bldg C-2b WP Agency Pai

**ATTACHMENT C**  
COMMUNITY SERVICES BLOCK GRANT  
**C-1c Strategic Plan Goals and Objectives**

Contractor 0 FFY 2025

Budget Period 10/1/24 to 9/30/25 Contract # 0

**Time frame of current Strategic Plan:** \_\_\_\_\_

**Briefly list the major goal and corresponding objectives contained in the plan that drive capacity building activities.**

*ADD ROWS, AS NEEDED, IN ORDER TO INCLUDE ADDITIONAL GOALS AND/OR OBJECTIVES*

**Goal:** \_\_\_\_\_

**Check One:**  CSBG Funds will be used to support this goal.  
 CSBG Funds will not be used to support this goal.

**Objectives:**

a) \_\_\_\_\_

b) \_\_\_\_\_

c) \_\_\_\_\_

← ▶ C-1a Needs Assessment C-1b Demonstrated Needs C-1c Strategic Plan C-2a WP Capacity Bldg C-2b WP Agency Pai ... + :

## Category Four: Organizational Leadership

**Standard 4.4** • The governing board receives an annual update on the success of specific strategies included in the Community Action Plan.

### Guidance

- The CSBG Act requires that boards be involved with the assessment, planning, implementation, and evaluation of the programs; this standard supports meeting that requirement.
- This standard is met by an update being provided at a regular board meeting and documented in the minutes.
- The update provided to the board may be written or verbal.
- The update provided to the board should include specific strategies outlined in the Community Action Plan and any progress made over the course of the last year, or by another period of time as determined by the board that is less than one year.

## Category Four: Organizational Leadership

**Standard 4.5** • The organization has a written succession plan in place for the CEO/ED, approved by the governing board, which contains procedures for covering an emergency/unplanned, short-term absence of 3 months or less, as well as outlines the process for filling a permanent vacancy.

### Guidance

- Board approval would most likely occur through a board vote at a regular board meeting.
- Documentation must include both elements: 1) plan for emergency/unplanned absence and 2) policy for filling a permanent vacancy.

# Category Four: Organizational Leadership

## Standard 4.5 • Resources

**Community Action Partnership Tool:**  
“Preparing for your Community  
Action Agency’s Future:  
Sustainability, Success & Transition:



## Category Four: Organizational Leadership

**Standard 4.6** • An organization-wide, comprehensive risk assessment has been completed within the past 2 years and reported to the governing board.

### Guidance

- Reporting to the governing board would most likely occur at a regular board meeting and should be reflected in minutes.
- It is important to note that to meet the Standard the organization only has to complete the assessment and report to the board. The results of the assessment are internal to the organization and therefore private.
- There is no one mandatory tool for completing this task. This comprehensive assessment is more than the financial risk assessment contained in the audit and may also include such areas as: insurance, transportation, facilities, staffing, property, etc. To meet the Standard, the tool(s) used needs to address organization-wide functions, not only individual program requirements.

# Category Four: Organizational Leadership

## Standard 4.6 • Resource

**Community Action Partnership  
Webinar: “From Risk Assessment to  
Comprehensive Risk Management”**

**Link to Community Action  
Partnership Assessment and Risk  
Resource Portal:  
<https://portal.nonprofitrisk.org/cap/>**

## From Risk Assessment to Comprehensive Risk Management

*September 17, 2020*



*A Deep Dive into the Organizational Standards  
Webinar Series*

**Human Capacity & Community Transformation**

**Center of Excellence**

**National Community Action Partnership**



# Category Four: Organizational Leadership

Standard 4.6 • Resource

501 Commons: “Five Elements Assessment”



## Five Elements Assessment



Presented by



## Category Five: Board Governance

**Standard 5.1** • The organization's governing board is structured in compliance with the CSBG Act:

1. At least one-third democratically-selected representatives of the low-income community;
2. With one-third local elected officials (or their representatives); and
3. The remaining membership from major groups and interests in the community.

### Guidance

- This standard is based on the CSBG Act and addresses the composition structure of the board only.
- See the CSBG Act and IM 82 for comprehensive guidance.

## Category Five: Board Governance

**Standard 5.2** • The organization's governing board has written procedures that document a democratic selection process for low-income board members adequate to assure that they are representative of the low-income community.

### Guidance

- See the CSBG Act and IM 82 for comprehensive guidance.
- See definitions list for additional clarity on democratic selection – please note that the CSBG Act requires a democratic selection process, not election process.
- Examples of democratic selection procedures for low-income sector directors include (1) election by ballots cast by the CAA's clients and/or by other low-income people in the CAA's service area (ballots could be cast, for example, at designated polling place(s) in the service area, at the CAA's offices, or via the Internet); (2) vote at a community meeting of low-income people (the meeting could serve not simply to select low-income sector directors but also to address a topic of interest to low-income people); (3) designation of one or more community organization(s) composed predominantly of and representing low-income people in the service area (for example, a Head Start policy council, low-income housing tenant association, or the board of a community health center) to designate a representative(s) to serve on the CAA's board.

## Category Five: Board Governance

**Standard 5.3** • The organization's bylaws have been reviewed by an attorney within the past five years.

### Guidance

- There is no requirement that the attorney be paid.
- Final reviews by attorneys on the board or on staff are not recommended, but are not disallowed

## Category Five: Board Governance

**Standard 5.4** • The organization documents that each governing board member has received a copy of the bylaws within the past two years.

### Guidance

- Distribution may be accomplished through electronic or hard copy distribution.
- Acknowledgment of receipt may be accomplished through a signed and dated written acknowledgement, email acknowledgement, board minutes documenting receipt for those in attendance, etc.

## Category Five: Board Governance

**Standard 5.5** • The organization's governing board meets in accordance with the frequency and quorum requirements and fills board vacancies as set out in its bylaws.

### Guidance

- There are no requirements on the meeting frequency or quorum; only that organizations abide by their approved bylaws.

# Category Five: Board Governance

**Standard 5.5** • Refer to the NYS Department of State Self-Assessment for the Annual Compliance Review of Organizational Standards (ACROS) or Triennial Review for Accountability and Compliance with Standards (TRACS). Both self-assessments contain a “DOS Attendance & Quorum Tracking Sheet”

[DOS Attendance & Quorum Tracking Sheet](#)

Board Member Name	Sector														Attendance
1															#DIV/0!
2															#DIV/0!
3															#DIV/0!
4															#DIV/0!
5															#DIV/0!
6															#DIV/0!
7															#DIV/0!
8															#DIV/0!
9															#DIV/0!
10															#DIV/0!
11															#DIV/0!
12															#DIV/0!
13															#DIV/0!
14															#DIV/0!
15															#DIV/0!
16															#DIV/0!
17															#DIV/0!
18															#DIV/0!
19															#DIV/0!
20															#DIV/0!
21															#DIV/0!
														Only current members	#DIV/0!
<b>DO NOT ENTER DATA IN GREEN COLORED CELLS</b>															
Quorum = % of members non-vacant:	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Number counted for quorum:	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Number needed for quorum:	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Quorum met Yes or No:	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
% quorum															

Double click table to access Excel Form.

## Category Five: Board Governance

**Standard 5.6** • Each governing board member has signed a conflict of interest policy within the past 2 years.

### Guidance

- There is no requirement to use a specific conflict of interest policy, only that the organization utilizes one that meets its needs.
- The signed conflict of interest policies are collected, reviewed, and stored by the organization.
- 2 CFR Part 200 (Super Circular) is in effect for any grant periods after December 26, 2014 and has additional information on conflict of interest policies and specific disclosures.
- As a point of reference, the 990 asks: Were officers, directors, or trustees, and key employees required to disclose annually interests that could give rise to conflicts? Did the organization regularly and consistently monitor and enforce compliance with the policy? If so, describe how

# Category Five: Board Governance

## Standard 5.6 • Resource

CAPLAW Webinar: [“Policies in Practice: Complying with the CSBG Organizational Standards, Webinar Three: Conflict of Interest Policy”](#)

The poster features a red header with the title 'Policies in Practice: Complying with the CSBG Organizational Standards Webinar Three: Conflict of Interest Policy'. Below the header, the date 'Thursday, May 14, 2020' is listed, followed by the presenters: Veronica Zhang, Esq. (veronica.zhang@caplaw.org) and Caroline Kelley, Esq. (caroline.kelley@caplaw.org, (617) 357-6915). The central illustration shows a large clipboard with the word 'POLICIES' and a checklist. A man in a suit stands next to the clipboard holding a megaphone. In the background, a woman sits on a desk with a laptop, and another person works at a desk. The CAPLAW logo is in the bottom left corner.

**Policies in Practice: Complying with the CSBG Organizational Standards**  
**Webinar Three: Conflict of Interest Policy**

Thursday, May 14, 2020

Presented by:  
**Veronica Zhang, Esq.**  
veronica.zhang@caplaw.org  
**Caroline Kelley, Esq.**  
caroline.kelley@caplaw.org  
(617) 357-6915

**CAPLAW**  
Community Action Program for the City of New York

## Category Five: Board Governance

**Standard 5.7** • The organization has a process to provide a structured orientation for governing board members within 6 months of being seated.

### Guidance

- There is no specific curricula requirement, or training methodology required; Board Orientation should have many organization-specific elements. These may include bylaws, overview of programs, and review of fiscal reports.
- Training may be delivered at board meetings, special sessions, in person, through electronic media, or through other modalities as determined by the board.
- The organization must have documentation of its process (including content), as well as documentation that each board member has been provided with the opportunity for orientation.

# Category Five: Board Governance

## Standard 5.7 • Resources

- BoardSource: [“What Goes into a Board Manual?”](#)
- CAPLAW: [“Training & Orientation Tool for Nonprofit CAA Boards”](#)
- CAPLAW Webinar: [“Mastering the A-B-CSBGs Tripartite Board Selection and Composition”](#)

## Category Five: Board Governance

**Standard 5.8** • Governing board members have been provided with training on their duties and responsibilities within the past two years.

### Guidance

- There is no specific curricula requirement, or training methodology required.
- Training may be delivered at board meetings, special sessions, conferences, through electronic media, or other modalities as determined by the board.
- The organization needs to have documentation that the training occurred (including content) as well as documentation that each board member has been provided with training opportunities.

# Category Five: Board Governance

## Standard 5.8 • Resources

- **CAPLAW: “All a-Board! Series: Duty of Care (Purpose)”**
- **CAPLAW: CSBG Training Module**




**All a-Board! Series: Duty of Care (Purpose)**  
The Purpose, People, and Process of CAA Boards

Engagement, Governance, Responsibilities, Training  
Board of Directors  
2021

This video investigates the **fiduciary duty of care** that CAA board members owe to the organization they serve. It identifies the source of the obligation for public and private CAAs and provides examples of how board members can fulfill that obligation. It also highlights the importance of written minutes and discusses how board committees can help the board meet its duty of care in an efficient, effective way.

Whether you're a new CAA board member eager to orient yourself to the work of community action, an existing board member looking for clarity on your role and responsibilities, or a board chair planning to facilitate a training at the next board meeting, the All a-Board! series can serve as a starting point or a refresher. As standalone resources, the videos offer frameworks and hypotheticals based on real-life board situations to help directors understand key aspects of CAA board service. They also complement CAPLAW's existing resources, highlighting important issues that board members can learn more about in our other publications.



The screenshot shows the CAPLAW CSBG Training Module interface. The main content area features the text "CSBG Community Services Block Grant Training Module" with the CAPLAW logo. A sidebar on the right lists the module's contents, including "CSBG Training Module", "CAPLAW Resource Library", "Table of Contents", "Activities & Resources", "Chapter 1 - History, Background, and Governing Law", "Chapter 2 - CSBG Purposes and Permitted Uses of...", "CSBG Purposes", and another "CSBG Purposes" entry. The bottom of the interface includes a video player control bar with a play button, volume, and a "Next" button.

## Category Five: Board Governance

**Standard 5.9** • The organization's governing board receives programmatic reports at each regular board meeting.

### Guidance

- This standard does not require a report on each program at every board meeting; however, it does call for some level of programmatic reporting at every board meeting. Organizations determine their own process to report programs to the board. For example, some organizations may cycle through their programs semi-annually, others may do so on a quarterly basis, and yet others may do a brief summary at every board meeting.
- Board minutes should reflect that programmatic reports have been received documentation.
- Programmatic reporting may be in writing (reports, dashboards) and/or verbal.

## Category Six: Strategic Planning

**Standard 6.1** • The organization has an agency-wide Strategic Plan in place that has been approved by the governing board within the past five years.

### Guidance

- This is intended to be an organization-wide document, not a list of individual program goals
- This would be met through the Board voting on a motion to accept the strategic plan at a regular board meeting and documenting this in the minutes.

# Category Six: Strategic Planning

## Standard 6.1 • Resources

- **Community Action Partnership Webinar:** [“Strategic Planning: Developing an Outcomes Based Strategic Plan”](#)
- **Other Community Action Partnership Strategic Planning Resources:** [Link to results to look through](#)

## Elements of a Strategic Plan Scorecard

Strategic Priority:					
Outcome	Target /Indicator	Services Strategies	Measure of Success	Year to Date	R/Y/G
		1.			Red
		2.			
		3.			
		1.			Green
		2.			
					Yellow



## Category Six: Strategic Planning

**Standard 6.2** • The approved Strategic Plan addresses the reduction of poverty, revitalization of low-income communities, and/or empowerment of people with low incomes to become more self-sufficient.

### Guidance

- These are the purposes of CSBG as laid out in the Act.
- These specific terms are not required, but the plan needs to include one or more of the themes noted in the Standard.

## Category Six: Strategic Planning

**Standard 6.3** • The approved Strategic Plan contains Family, Agency, and/or Community goals.

### Guidance

- These goals are set out as part of ROMA, referenced in IM 49, and provide the framework for the National Performance Indicators.
- These specific terms are not required, but the plan must address one or more of these dimensions.
- There is no requirement to address all three: family, agency, and community.

## Category Six: Strategic Planning

**Standard 6.4** • Customer satisfaction data and customer input, collected as part of the community assessment, is included in the strategic planning process.

### Guidance

- This standard links the community assessment with strategic planning.
- There is no requirement to do additional data collection.
- Please see guidance and glossary under Customer Engagement for more information on customer satisfaction and customer input.
- The standard may be documented by references to the analysis of customer satisfaction data and input within the plan, or by including the analysis of customer satisfaction data in the plan or its appendices, with a brief explanation of how it was used.

## Category Six: Strategic Planning

**Standard 6.5** • The governing board has received an update(s) on progress meeting the goals of the Strategic Plan within the past 12 months.

### Guidance

- This standard links the community assessment with strategic planning.
- There is no requirement to do additional data collection.
- The standard may be documented by references to the analysis of customer satisfaction data and input within the plan, or by including the analysis of customer satisfaction data in the plan or its appendices, with a brief explanation of how it was used.

# QUESTIONS



# OPERATIONS AND ACCOUNTABILITY



## 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

# **CATEGORY SEVEN: HUMAN RESOURCE MANAGEMENT**



# Category Seven: Human Resource Management

**Standard 7.1** • The organization has written personnel policies that have been reviewed by an attorney and approved by the governing board within the past 5 years.

## **Not applicable for Public Entities**

**Public Entities (government agencies):** Local governmental personnel policies are outside of the influence of the department and the tripartite board/ advisory body; therefore, this standard does not apply to public entities.

## **Guidance**

- There is no requirement that the attorney be paid but should be a currently practicing attorney.
- Final reviews by attorneys on the board or on staff are not recommended but are not disallowed.
- Note that the review needs to have occurred at some point during in the past five calendar years.
- Agencies may work with human resource professionals (such as SHRM certified staff) and others (attorneys on staff or on the board) prior to the legal review to minimize cost. □ Note that not all attorneys are familiar with Human Resource issues, and agencies are encouraged to use attorneys with this type of expertise.

# Category Seven: Human Resource Management

**Standard 7.2** • The organization makes available the Employee Handbook (or personnel policies in cases without a Handbook) to all staff and notifies staff of any changes.

## Guidance

- The Handbook may be made available in electronic (such as an agency intranet, a location on a shared server, or distributed via email) or print formats.
- The process for notification of changes is up to the individual organization.
- Agencies are encouraged to have staff sign off that they have received and read the Employee Handbook.

# Category Seven: Human Resource Management

**Standard 7.3** • The organization has written job descriptions for all positions, which have been updated within the past 5 years.

## Guidance

- This references job descriptions for each type of position, not each staff person.
- To meet the Standard, job descriptions may include date of last review/update; the Standard does not require changes when descriptions are reviewed.
- The time frame is defined as within the past 5 calendar years.

# Category Seven: Human Resource Management

**Standard 7.4** • The governing board conducts a performance appraisal of the CEO/Executive Director within each calendar year.

## Guidance

- There is no specific appraisal tool required to be used.
- This may be accomplished through a committee or the full board; however, the full board should receive and accept via board vote the appraisal, with the acceptance reflected in the board minutes.
- The approval of the performance appraisal is often done in conjunction with setting the CEO compensation.

# Category Seven: Human Resource Management

**Standard 7.5** • The governing board reviews and approves CEO/Executive Director compensation within every calendar year.

## Guidance

- The full board should review and approve the total compensation at a regular board meeting and have it reflected in the board minutes.
- This includes salary, fringe, health and dental insurance, expense/travel account, vehicle, etc.
- As a point of reference, the 990 asks: Did the process for determining compensation of the following persons include a review and approval by independent persons, comparability data, and contemporaneous substantiation of the deliberation and decision?...and if yes, describe the process.
- The compensation review and approval often happens in conjunction with the CEO performance appraisal.

# Category Seven: Human Resource Management

**Standard 7.6** • The organization has a policy in place for regular written evaluation of employees by their supervisors.

## Guidance

- The Standard calls for a policy being in place.
- It is recognized that it is best practice to have annual reviews for every employee, but the Standard is not intended to imply that 100% of employees must have an annual review. This caveat is noted given normal business conditions that may impact individual employees at any given time, e.g. timing of resignation/dismissal, FMLA leave, seasonal, etc.

# Category Seven: Human Resource Management

**Standard 7.7** • The organization has a whistleblower policy that has been approved by the governing board.

## Guidance

- Once the whistleblower policy is approved and in place, there is no requirement for additional review under this standard. It is good policy for boards to periodically review their whistleblower policy to ensure that they are operating in compliance with it.
- This would be met through a vote by the board at a regular meeting and noted in the minutes.
- Many organizations incorporate their whistleblower policy into their Personnel Policies or Employee Handbook. If not included, the Whistleblower policy should be made available to staff via other means.

# Category Seven: Human Resource Management

**Standard 7.8** • All staff participate in a new employee orientation within 60 days of hire.

## Guidance

- There are no curriculum requirements for the orientation; the organization determines the content. Some examples of content include time and effort reporting, ROMA, data collection, mission, history of Community Action, etc.
- This may be met through individual or group orientations and documented in personnel files.
- The date of hire is considered to be the first day the employee works at the organization.

# Category Seven: Human Resource Management

**Standard 7.9** • The organization conducts or makes available staff development/training (including ROMA) on an ongoing basis.

## Guidance

- There are no specific requirements for training topics, with the exception of ROMA (or comparable system if one is used and approved by the State).
- This standard may be met through in-house, community-based, conference, online and other training modalities. Agencies may conduct their own training in-house or may make online or outside training available to staff.
- This should be documented in personnel files.

# CATEGORY EIGHT: FINANCIAL OPERATIONS AND OVERSIGHT



# Category Eight: Financial Operations and Oversight

**Standard 8.1** • The organization's annual audit (or audited financial statements) is completed by a Certified Public Accountant on time in accordance with Title 2 of the Code of Federal Regulations, Uniform Administrative Requirements, Cost Principles, and Audit Requirement (if applicable) and/or State audit threshold requirements.

## Guidance

- Completed by a Certified Public Accountant on time in accordance with Single Audit Guidelines.
- The annual audit is due nine calendar months after the organization's fiscal year end and should be accepted by the Federal Audit Clearinghouse on or prior to that time
- Required under Federal Law for any organization that receives \$750,000 or more in federal dollars

# Category Eight: Financial Operations and Oversight

**Standard 8.2** • All findings from the prior year's annual audit have been assessed by the organization and addressed where the governing board has deemed it appropriate.

## Guidance

- This standard can be met through board discussion and decisions at a regular board meeting with decisions noted in the minutes.
- As a best practice, Board minutes should have the relevant portion highlighted for quick reference
- Findings are those noted in the Audit itself, not the Management Letter.

# Category Eight: Financial Operations and Oversight

**Standard 8.3** • The organization's auditor presents the audit to the governing board.

## Guidance

- The presentation to the board should be reflected in the Minutes.
- This standard can be met via the auditor meeting with the full board or appropriate committee including Finance, Finance/Audit, Audit, or Executive. If done via committee, a report to the full board by the Committee Chair to confirm the meeting occurred needs to be completed and documented in the minutes.
- The Auditor may make the presentation in person or via web or conference call as allowed by state law. In addition, ensure that the bylaws allow for electronic communication if the auditor or their representative presents in this way.
- The presentation may be made by a representative(s) of the audit firm and is not required to be the Partner of the firm engaged in the audit.

# Category Eight: Financial Operations and Oversight

**Standard 8.4** • The governing board formally receives and accepts the audit.

## Guidance

- This standard can be met through a board vote accepting the audit at a regular board meeting and reflected in the minutes.
- As a best practice, Board minutes should have the relevant portion highlighted for quick reference
- Each board member should be provided a copy of the audit, either in hard copy or electronic format, with this distribution noted in the board minutes.

# Category Eight: Financial Operations and Oversight

**Standard 8.5** • The organization has solicited bids for its audit within the past 5 years.

## Guidance

- The Standard does not require that an organization switch auditors or partners, only that the audit is put out to bid within the past 5 years.
- An informal process does not meet the standard; a formal Request for Proposal (RFP) process has to be conducted and the organization's procurement policy should be followed
- The RFP document should clearly lay out evaluation and bidding criteria. Only soliciting information about fees is not sufficient.
- Reasonable efforts must be made to solicit maximum competition for the bidding process, but there is no minimum number of bids to make a final selection.

# Category Eight: Financial Operations and Oversight

## Standard 8.5 (Continued)

### Guidance

- Documentation should be retained for each bid or quote received
- The Board or an appropriate committee of the Board should be involved in the selection process, with board or committee minutes documenting the selection
- The organization should complete a scoring matrix for each audit bid received and retain that documentation.
- Possibly scoring criteria include, but are not limited to:
  - Auditing Experience level
  - Value-added services beyond the audit
  - Size of firm
  - Independence from the organization
  - Results of peer review
  - Estimated time of completion
  - Expected Cost

# Category Eight: Financial Operations and Oversight

**Standard 8.6** • The IRS Form 990 is completed annually and made available to the governing board for review.

## Guidance

- The IRS Form 990 is a publicly available document, and specifically asks if the board has reviewed the document prior to its submission. It also asks for a description of the review process.
- The review process for the 990 should be documented in the board minutes; the Standard does not require board acceptance or approval of the IRS Form 990.
- The IRS Form 990 can be made available by sharing a copy electronically or in hard copy to governing board members with the process noted in the minutes. Documentation of how the Board received the 990 should be provided
- The IRS Form 990 is due to the IRS five and a half months after the organization's fiscal year end

# Category Eight: Financial Operations and Oversight

**Standard 8.7** • The governing board receives financial reports at each regular meeting that include the following:

1. Organization-wide report on Revenue and Expenditures that compares Budget to Actual, categorized by program; and
2. Balance Sheet/Statement of Financial Position.

## Guidance

- Categorization by program does not require reporting by individual funding stream; it may be by organization-defined program areas, e.g., Early Childhood, Energy, Housing, etc.
- This does not limit the financial information a board receives at each board meeting. Individual agencies are likely to determine that additional information is needed by the board and should determine what specific information needs to be shared with the board beyond that included in the Standard.

# Category Eight: Financial Operations and Oversight

**Standard 8.8** • All required filings and payments related to payroll withholdings are completed on time.

## Guidance

- This includes federal, state, and local taxes; as well as worker's compensation, insurance, retirement, disability, and unemployment.
- This also includes the timely filing of the IRS 990, the IRS 5500, the CHAR500, and the annual audit
- Documentation may include information received from a payroll service if used or the organization's financial management system. Such verification could be reviewed at the committee level if the organization determines it necessary or delegated to the Executive Director.

# Category Eight: Financial Operations and Oversight

**Standard 8.9** • The governing board annually approves an organization-wide budget.

## Guidance

- This would be met through approval at a regular board meeting and documented in the board minutes.
- As a best practice, Board minutes should have the relevant portion highlighted for quick reference
- This is intended to complement, not replace, program budgets.
- It is recognized that each grant or program will likely have an annual budget that may cross two organization fiscal years.
- It is important to note that an organization-wide budget is a forecast for the upcoming organization fiscal year, based on the best information at the time of development. It provides the board with an overview of what the expected revenues and expenditures are likely to be over the course of a year, with the knowledge that the actual revenue and expenditures may differ. There is no requirement for the organization to pass a modified organization-wide budget during the course of a year as things change.

# Category Eight: Financial Operations and Oversight

**Standard 8.10** • The Fiscal Policies have been reviewed by staff within the past 2 years, updated as necessary, with changes approved by the governing board.

## Guidance

- This would be met through approval at a regular board meeting and documented in the board minutes.
- As a best practice, Board minutes should have the relevant portion highlighted for quick reference
- There are no requirements for which specific staff need to be involved in the staff-level review.
- The annual reporting of the staff level review of the fiscal policies may be made at a fiscal committee meeting with the committee minutes reflecting the review.

# Category Eight: Financial Operations and Oversight

**Standard 8.11** • A written procurement policy is in place and has been reviewed by the governing board within the past 5 years.

## Guidance

- This would be met through approval at a regular board meeting and documented in the board minutes.
- The procurement policy may be found in an organization's fiscal policies; it does not need to be a separate document.
- Per 2 CFR 200, Subpart D, 200.321, Efforts should be made to contract with Minority- or Women-owned business enterprises
- Per 2 CFR 200, Subpart D, 200.319, the procurement policy should prioritize a free and open competitive process

# Category Eight: Financial Operations and Oversight

**Standard 8.12** • The organization documents how it allocates shared costs through an indirect cost rate, or through a written cost allocation plan.

## Guidance

- If no approved indirect cost rate is in place, the organization must have a written cost allocation plan.
- If no approved indirect cost rate is in place, the cost allocation plan should be based on current data that is updated periodically as outlined in the cost allocation plan
- A Federally Negotiated Indirect Cost Rate should be currently approved, with a supporting Indirect Cost Rate letter.

# Category Eight: Financial Operations and Oversight

**Standard 8.13** • The organization has a written policy in place for record retention and destruction.

## Guidance

- This includes the retention and destruction of both electronic and physical documents.
- This Policy may be a stand-alone policy or may be part of a larger set of organization policies.
- A written record retention and destruction policy should aim for documents to be retained in compliance with the organization's various audit and contractual record retention requirements.
- Not-for-profit organizations are required to have this policy in compliance with federal law under the Sarbanes-Oxley Act

# QUESTIONS



# CATEGORY NINE: DATA AND ANALYSIS



# Category Nine: Data and Analysis

**Standard 9.1** • The organization has a system or systems in place to track and report client demographics and services customers receive.

## Guidance

- Some funders require their own systems be used; the organization may or may not have an organization-wide system in place. As long as all services and demographics are tracked, this standard would be met.
- The CSBG Annual Report requires the reporting of client demographics. This standard does not require additional demographic data collection or reporting.

## Category Nine: Data and Analysis

**Standard 9.2** • The organization has a system or systems in place to track Family, Agency, and/or Community outcomes.

### Guidance

- Some funders require their own systems be used; the organization may or may not have an organization-wide system in place. As long as outcomes are tracked, this standard would be met.
- This may or may not be the same system(s) noted in 9.1.

# Category Nine: Data and Analysis

**Standard 9.3** • The organization has presented to the governing 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.

## Guidance

- This standard would be met through board or staff discussions as long as the analysis and discussion are documented.
- It is important to note that an organization is likely to have multiple programs with varying program years. This standard addresses an annual review of organization outcomes. Organizations are likely to make operations and strategic program adjustments throughout the year, making a single point in time analysis less effective than ongoing performance management.
- Organizations can meet this standard by having: an annual board discussion of organization outcomes, multiple conversations over the course of the year, or other process the organization deems appropriate as long as these discussions are reflected in the minutes, with any operational or program adjustments or improvements being noted.
- Organizations are not required to make adjustments in order to meet the standard, only to have conducted an analysis.

## Category Nine: Data and Analysis

**Standard 9.4** • The organization submits its annual CSBG Information Survey data report and it reflects client demographics and organization-wide outcomes.

### Guidance

- See CSBG State Lead Agency for specifics on the submission process.
- The CSBG Information Survey data report already requires the reporting of client demographics and organization-wide outcomes. This standard does not require additional data collection or reporting.

# **GLOSSARY OF TERMS**



# Glossary of Terms - Example

## Vision and Direction – Category 5: Board Governance

### **Reviewed by an attorney:**

A licensed attorney has reviewed and provided the board with assurances the document complies with the applicable laws. There is no requirement that the attorney must be paid; they may be pro bono. While recommended that the attorney is not a board member, there is no prohibition of this in the Standards. An invoice noting the review, letter documenting the review, etc. would serve as documentation that this has occurred. The content of the review is not required to be shared beyond the board to meet the standard in order to maintain attorney client confidentiality.

# Glossary of Terms - Example

## Vision and Direction – Category 5: Board Governance

### **Board training:**

Training provided to board members either in person or other methodology as determined by the board. Sessions may be done as part of a board meeting or as a separate event. Some CEEs conduct small trainings at each meeting to provide ongoing learning. Content may vary by training. Conducted by someone with expertise in the topic being addressed.

# Glossary of Terms - Example

## Vision and Direction – Category 5: Board Governance

### **Structured orientation:**

A standard outline of content to be shared with new board members and the method by which it is shared. This may be through an in-person orientation with the Board Chair, Board Development Committee or Committee Chair, ED/CEO, or other methodology as determined by the board. Such orientation often includes: copies of agency bylaws, fiscal reports, board minutes, etc.

**“Together we must insist upon accountability and performance management across the CSBG Network. The COE-developed organizational standards have the potential to protect and enhance the structural integrity of this national network by assuring that all entities that annually receive CSBG funds have the capacity to organize and support a comprehensive community response to the complex social problems that contribute to poverty.”**

FROM INFORMATIONAL MEMORANDUM 138



# QUESTIONS





**Department of State**  
**Community Services**