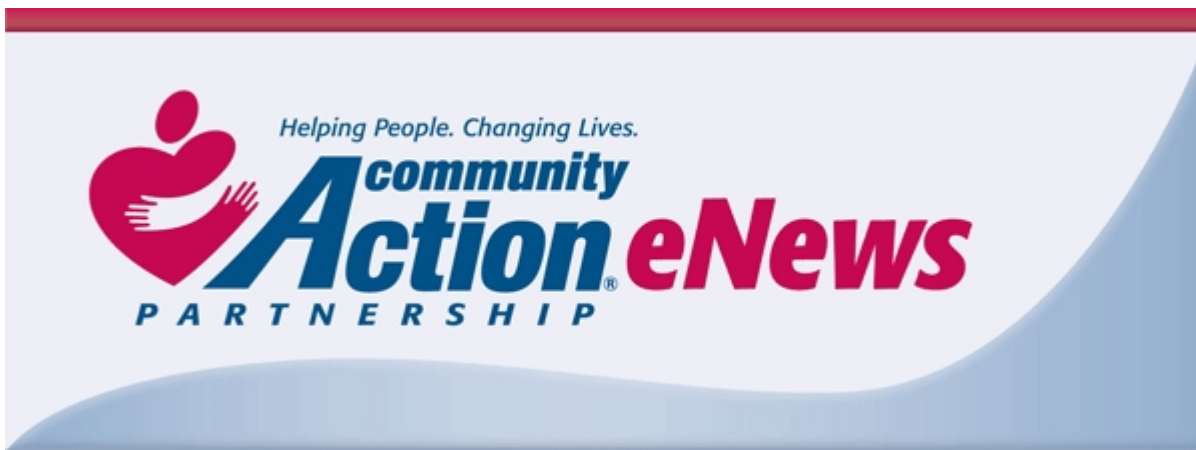


**From:** Denise Harlow [<mailto:dharlow@communityactionpartnership.com>]  
**Sent:** Monday, January 26, 2015 5:09 PM  
**To:** Gallegos, Norma  
**Subject:** Special Edition - Organizational Standards-Information Memorandum 138

Having trouble viewing this email? [Click here](#).



## **Federal Office of Community Services Releases IM 138 On CSBG Organizational Standards**

Today (1/26/15), the Federal Office of Community Services released its Final Information Memorandum (IM) on the Community Services Block Grant Organizational Standards. The CSBG/Community Action Network has been awaiting its release.

**[Click here to download IM 138.](#)**

**IM 138** outlines the Establishment and Implementation of Organizational Standards. The IM addresses State CSBG Lead Agency oversight, assessment, corrective action, the role of the State Plan and CSBG Annual Report, exceptions for limited-purpose agencies and other special circumstances. It touches on the impact of the State Accountability Measures and the OMB review process of the Model State Plan and Annual Report.

**IM 138** also finalizes the Center of Excellence (COE) Developed Organizational Standards. These include 58 Standards for Private/Nonprofit Community Action Agencies/CSBG Eligible Entities and 50 Standards for Public Community Action Agencies/CSBG Eligible Entities

This special edition of the Enews features detailed information concerning the new IM and on a [free webinar for Community Action](#) being hosted this week by the Partnership's Organizational Standards of Excellence, **Friday, January 30th at 12:00 ET/11:00 CT/10:00 MT/9:00 PT.**

[Register Today](#)

## READ IM 138 AND REGISTER FOR NATIONAL WEBINAR



**IM 138, released January 26, 2015, [can be read here.](#)** We encourage you to read it in its entirety. Register for an update from the Organizational Standards Center of Excellence via webinar on **January 30, 2015 at 12 ET/11 CT/10 MT/9 PT.** This webinar is free, but pre-registration is required. You are encouraged to have multiple listeners with a single log in.

[Register here](#)

## CHANGES IN THE ORGANIZATIONAL STANDARDS: NOW 58 FOR NONPROFIT CAAs AND 50 FOR PUBLIC CAAs

On 1/21/2015 the CSBG Working Group met with Jeannie Chaffin and Seth Hassett on the Organizational Standards to do a final review of modifications compiled after full OCS review. While most edits were stylistic in nature, the CSBG Working Group did discuss three modifications that were more substantive. These changes increase the number of Standards from 56 to

### RESOURCES from the Organizational Standards Center of Excellence

Below are a few resources providing guidance on the Standards. These tools are not meant to be used for monitoring.

*With the new IM, these resources will be updated to reflect the changes and modifications made to the Standards.*

#### Assessment Tools:

- [Self-Assessment for Private CAA's \(nonprofits\)](#)
- [Self-Assessment for Public CAA's \(government entities\)](#)
- [State-Assessment for Private CAA's \(nonprofits\)](#)
- [State](#)

58 for Private/nonprofit CAAs and from 48 to 50 for Public CAAs. The CSBG Working Group reviewed, discussed, and agreed that the changes were in keeping with the spirit and intent of the CSBG Organizational Standards and reflected the core elements of being straightforward and measurable, respecting the balance of compliance with high performance expectations, and reflecting the vision and values of Community Action. The Final IM includes this final set of Center of Excellence (COE) developed CSBG Organizational Standards.

The 3 substantial changes are:

### **Additional Standard in Category 3: Community Assessment**

3.4 Private CAA - The community assessment includes key findings on the causes and conditions of poverty and the needs of the communities assessed.

3.4 Public CAA - The community assessment includes key findings on the causes and conditions of poverty and the needs of the communities assessed.

### **Additional Standard in Category 4: Organizational Leadership**

4.4 Private CAA: The governing board receives an annual update on the success of specific strategies included in the Community Action plan.

4.4 Public CAA: The tripartite board/advisory body receives an annual update on the success of specific strategies included in the Community Action plan.

### **Changes to Standard 9.3**

Private CAA: 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.

Public CAA: The department has presented to the tripartite board/advisory body for review or action, at least within the past 12 months, an analysis of the agency's outcomes and any operational or strategic

[Assessment for Public CAA's](#) (government entities)

(All of the assessment tools are available in Word format on the [CSBG Organizational Standards Quick Link](#) on the Partnership's website.)

### **Glossary of Terms:**

- [Glossary of Terms](#) - Intended to provide additional clarity as to the intent of the CSBG Working Group in the development of the Standards.

### **For Boards:**

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program adjustments and improvements identified as necessary.

The full text of IM 138 and the individual Organizational Standards can be found [here](#).

To view the original language, you can [click here](#) to see the original submission to OCS on July 10, 2013.



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## SECTIONS OF IM 138 THAT MAY BE OF SPECIAL INTEREST

### State Oversight

Section 678B of the CSBG Act (42 U.S.C. § 9914) requires State CSBG Lead Agencies to establish "performance goals, administrative standards, financial management requirements, and other requirements" that ensure an appropriate level of accountability and quality among the State's eligible entities. The purpose of States using the organizational standards is to ensure each eligible entity has appropriate organizational capacity to fulfill the purposes of the CSBG Act. As noted below, States have discretion to determine how organizational standards will be implemented as part of their overall oversight strategy.

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### *Assessment of Standards*

Once the expectations for organizational standards are established and communicated to the eligible entities across a State, the State CSBG Lead Agency is responsible for assessing the status of standards among all of the eligible entities annually and for reporting to OCS on the standards in the CSBG Annual Report. States may design an approach for assessing organizational standards that fits within the oversight framework in their State. Many States may integrate standards assessment into their regular CSBG monitoring procedures, while other States may choose different oversight approaches, such as peer-review, assessment by a consultant or third party, or self-assessment. Some States may also choose a hybrid approach involving two or more strategies. Regardless of the approach, States must ensure the assessment of standards is independently verified by the State or a third party.

...Please see [IM 138](#) for the remainder of the section on *Assessment of Standards*...

### **Corrective Action**

During the assessment process, if a State finds an eligible entity is not meeting a standard or set of standards, the State's response will depend on the circumstances. In cases where the eligible entity may be able to meet the standard in a reasonable time frame contingent on some targeted technical assistance, the State and entity may develop a technical assistance plan to target training and technical assistance resources and outline a time frame for the entity to meet the standard(s). If appropriate in other situations, the State may initiate action in accordance with section 678C of the CSBG Act (42 U.S.C. § 9915), including the establishment of a Quality Improvement Plan (QIP) with clear timelines and benchmarks for progress.

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

The failure of an eligible entity to meet multiple standards may reflect deeper organizational challenges

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and risk. In those cases, a State must determine whether it may be necessary to take additional actions, including reducing or terminating funding, in accordance with [CSBG IM 116](#) (*Corrective Action, Termination, or Reduction of Funding*), issued May 1, 2012. OCS and States do not have the authority under the CSBG Act to bypass the process described in CSBG IM 116 in order to re-compete CSBG funding based on failure to meet organizational standards.

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## LIMITED PURPOSE AGENCIES, SMALL AGENCIES, AND OTHER SPECIAL CIRCUMSTANCES

There have been questions raised since the beginning of Organizational Standards development about Limited Purpose Agencies, state-funded tribal organizations, migrant and seasonal farmworker organizations as well as very small agencies (budgets less than \$50,000) or those with very small CSBG allocations (less than \$15,000). [IM 138](#) addresses these and in part states:

In these special circumstances, States should assess both the applicability of the standards and the administrative burden for very small entities. States should also assess whether these agencies that are unable to meet the organizational standards are otherwise equipped to meet the purposes and goals of the CSBG Act, and whether alternative approaches, such as shared administrative supports or mergers, should be considered in order to assure appropriate capacity.

States may describe the rationale for not implementing the COE-developed or alternative organizational standards for these specific entities in their State plan, which will be subject to OCS review. However, as appropriate, States should describe other types of appropriate standards for excepted entities in order to ensure performance and accountability appropriate to the specific purpose and scope of the Federal support.

See [IM 138](#) for the full text.

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## PROCESS AND TIMING FOR PLANNING AND ROLL-OUT

[IM 138](#) maintains the expectation that Organizational Standards will need to be addressed in the FY 2016 State Plan. The IM reads:

States are expected to use organizational standards for assessing eligible entities starting in FY 2016. In order to do this, States must include information about organizational standards in their FY 2016 application and State plan, due September 1, 2015.

OCS encourages States to start planning for this process now, in FY 2015, particularly if State procedures for establishing official organizational standards may require a lengthy implementation period. For example, if a State uses regulation to establish official CSBG policy for the eligible entities, the State may want to begin that process in advance of the FY 2016 CSBG application cycle. The timelines for any necessary rulemaking, including any potential obstacles that would prevent full implementation by FY 2016, must be described in the State plan. OCS will work with States that may need additional time due to rulemaking issues.

Any State that submitted a two-year plan for FY 2015 (due September 1, 2014) that did not include organizational standards for FY 2016 will have to submit a supplemental application for FY 2016 that includes organizational standards. This submission will be incorporated into the process for the FY 2016 submission of the State's 424-M application, which States must submit annually online in order to receive CSBG funding.

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## ADDITIONAL DEAR COLLEAGUE LETTERS EXPECTED

In OCS' [Dear Colleague Letter](#) from December 19, 2014 they noted that there will be several communications in the coming weeks on the CSBG performance management framework. In addition to [IM 138](#) on Organizational Standards, expect to see two Dear

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Colleague Letters. One with a draft IM for comment on the State and Federal Accountability Measures. Another Dear Colleague is expected to share the Model State Plan and the opportunities for feedback.

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*Note, this eNews is a summary conducted by the Community Action Partnership and not intended to provide any advice or interpretation of the IM. Please refer to IM 138 for specifics. Contact Denise Harlow at [dharlow@communityactionpartnership.com](mailto:dharlow@communityactionpartnership.com) with any questions about the content of this eNews.*

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