

CSBG Working Group - Creating CSBG's Future

The Administration's 2012 budget recommended reducing CSBG by fifty percent and transforming it from a formula-based program to a competitive grant program. NASCSP, the Community Action Partnership and other partners have had meetings with U.S. Department of Health and Human Services, Administration for Children and Families (ACF), Acting Assistant Secretary, David Hansell and Deputy Assistant Secretary for Policy, Mark Greenberg and others who have indicated a willingness to work together on the future shape of CSBG and Community Action. They have acknowledged that the Network will continue to pursue appropriate funding to meet the needs of families and communities of America.

While we respect the Administration's efforts to improve results for people living in poverty and distressed communities, we strongly believe the path to high performing states and CAAs can be achieved via building on the accountability and performance efforts present in the CSBG Network today. *State CSBG offices, CAAs, and State CAA Associations have achieved successful results, such as the creation of thousands of jobs with Recovery Act funding, helping thousands of people emerge from poverty every year and addressing the needs of tens of millions of Americans, during the recent recession that has left so many people still in critical need. We have a solid foundation of success to build on for the future.*

On April 21, 2011, NASCSP and the Community Action Partnership convened a representative group of leaders from Community Action Agencies, State CSBG offices, state Community Action Associations and the national organizations to develop input on CSBG to the Administration for Children and Families from our Network, and to identify solutions that strengthen performance and increase accountability at the federal, state and local levels. The list of participants from the April 21 convening appears at the end of this document. We believe that this groups' expertise as well as the experience of the CSBG Network and your collective knowledge will result in identification of solutions that CSBG stakeholders can use to inform decision makers and leaders. It is critical that we provide input to ACF on the future of our program as soon as possible.

The group agreed there are areas that can be addressed that will improve results for low-income families and communities and the Working Group came to consensus that any future reforms should focus on six key principles, and five areas of specific recommendations. The initial Working Group, with the additional input of more Community Action experts, broke into five subcommittees to develop more detailed recommendations in these areas. The next section is comprised of the guiding principles, and the rest of this document outlines the initial coordinated recommendations of five subcommittees. **It is important to note that this document does not have any formal approval from the collective members of the original Working Group. There is some disagreement about specific recommendations, and those areas of concern are noted as they appear.**

Please know that this draft document is a work in progress, and very much is being shaped by the Working Groups' and your Network input. It is being shared with the Boards of Directors of the National CSBG Partners for their review and input, and concurrently with the Community Action Network for broad input. Later in June, the recommendations, shaped and

guided by Community Action Network input, will be shared with ACF. The CSBG Working Group believes it is essential to obtain feedback from the CAA Network and has established a time line to secure input. We need your thoughts on the recommendations and other good ideas you may have - please read this entire document carefully, and submit comments and suggestions by **June 27, 2011** to: csbg@communityactionpartnership.com. Additionally, if you are interested in being part of this process going forward through online workgroups and discussion calls, please let us know.

Principles

These core principles were extensively discussed and shaped by the Working Group. They represent areas where the group was in general agreement, and it was agreed that they would form the core elements of any response to ACF:

1. **Federal Accountability:** Federal oversight of States must be focused and include mechanisms for holding States accountable and correcting problems when they exist.
2. **State and Local Accountability:** The creation and definition of performance criteria that are consistent, non-arbitrary and possible for State and local grantees to meet could strengthen the CSBG Network. The use of performance criteria in an accountability system that may include a performance threshold should be developed with maximum participation of the CSBG Network, including comment periods and a transition plan. Technical assistance and due process must be part of any accountability plan that includes performance thresholds as well as consequences for failing to meet defined criteria.
3. **High Performance:** CSBG funds must be used by the locally designated community action agency to provide local and innovative responses to the causes and conditions of poverty. Local performance results must be transparent and used to diagnose, fix, improve or reallocate resources in the pursuit of high performance outcomes.
4. **State Authority:** States need the authority to hold local agencies accountable and the capacity to assist them in enhancing their impact through innovation and capacity.
5. **Local Flexibility:** The Federal, State, and local model is essential with local agencies having flexibility and control to determine their priorities, based on the results of local community needs assessments and locally driven planning processes.
6. **National Infrastructure:** The infrastructure of a national network is critical. This develops, promotes and disseminates best practices, which help ensure the most efficient and cost-effective use of Federal dollars. All communities, rural, suburban and urban, must have access to a local agency committed to reducing poverty, building economic opportunity and coordinating Federal, State, and local resources. State designation of local agencies assures there will be an organization with the mission of reducing poverty.

Areas for Specific Recommendations

The five areas for initial focus identified below were developed by the CSBG Working Group at the April 21 meeting in Washington, DC. Following this list are the more detailed sub-committee recommendations designed to strengthen the Network:

1. **Promotion of High Performance and Accountability via Establishment of Performance Criteria and Thresholds for Local Entities:** Recommendations for developing and defining clear criteria appropriate for a performance threshold for local entities. The work group will consider using the Community Action Partnership's Baldrige-based Community Action Standards of Excellence. Additionally, consequences for not meeting the threshold, time frames, due process, and technical assistance will be outlined. Other alternatives for encouraging high performance and innovation such as new funding pools will be considered.
2. **Promotion of High Performance and Accountability via Establishment of Performance Criteria for States:** Recommendations for developing and defining clear criteria appropriate for State accountability will be identified. Tools such as the NASCSP Monitoring Standards and State Self-assessment will be considered. Effective monitoring, staff expertise and other key issues will be part of the discussion.
3. **Effective and Consistent Federal Oversight:** Recommendations for Federal oversight to enforce compliance at the State level, and explore options that are used for State repayment in other block grants when States are non-compliant will be examined.
4. **Standard Implementation of ROMA:** Results-Oriented Management and Accountability currently serves as a local diagnostic tool to fix, improve and redirect funding to other programs. The four core ROMA Activities of assessment, planning, implementing and evaluating will be looked at with an eye toward how they can be used as performance criteria and how results can be used at the local, State and Federal level to promote what works, identify promising practices and effectively target resources.
5. **Use of Evidence Based Programs in CSBG:** The workgroup will look at how evidence based programs are currently being utilized in CSBG and make recommendations for how evidence based efforts can be promoted in the future.

Promotion of High Performance and Accountability Via Establishment of Performance Criteria and Thresholds for Local Entities

Work Group: John Edwards, Lana Ross, Connie Greer, Angus Chaney, Wilma McKay, Mary Lockhart-White, Lil Dupree

Note: This was an area where there was not universal agreement on the subcommittee's recommendations.

To be effective at addressing the causes and symptoms of poverty in America, every Community Action Agency should continually strive to improve how services and programs are implemented and how customers are served. This requires the full adoption of processes for continuous improvement to achieve and maintain high performance.

A. Identify recommendations for the overall process for applying thresholds to local agency performance, with criteria, including consequences, roles, time frames, etc.

We support adoption of a set of performance standards to be used to establish thresholds for minimum accepted achievement as well as promotion of high performance achievement. The Community Action Standards of Excellence Seven Categories of Excellence are the foundation for measuring a CAA's performance in the following areas:

- Category 1 – Organizational Leadership: This category examines the CAAs leadership system and how senior leaders guide the Agency.
- Category 2 – Strategic Planning and Direction: This category examines how the CAA sets strategic direction, develops and updates action plans that are integrated living documents that guide the CAA.
- Category 3 – Customers, Constituent, and Partner Focus: This category examines how the CAA seeks to understand its customers, constituents and stake holders in the community and the relationship the Agency has with these groups.
- Category 4 – Measurement, Analysis and Performance Management: This category examines the CAA's information and performance measurement systems and how data is used to manage and improve performance.
- Category 5 – Human Resource Focus: This category examines how the CAA's staff and work systems enable employees to develop their full potential to achieve the CAA's mission work.
- Category 6 – Organizational Process Management: This category examines CAA's efficiency and effectiveness of key administrative and service delivery processes.
- Category 7 – Organizational Results: This category examines the CAA's performance trends, results and improvements over time, implementation of ROMA to generate outcomes.

These criteria will be used as a guide for Community Action Agencies to transition from compliance to excellence.

Knowledge and experience gained through the Pathways to Excellence process will be used to establish both threshold expectations and high performance expectations. Prevention-based, evaluative, refined and world class concepts, evidenced-based and

promising practices will be used to define high performance achievement. Evidence of organizational and program effectiveness must be commenced at this point.

Competition for additional funding for high performance achievement will be made to CAAs to pursue innovative strategies that reduce poverty in the community served. Conversely, consequences for not meeting threshold requirements will necessitate state and federal administrators to require a quality improvement plan and an agreed upon time-frame for improvement. If the CAA fails, it may be defunded and the process of finding a replacement Agency commenced. This process must be refined, detailed and consistently applied nationwide.

B. Articulate a plan for identifying local Agency performance threshold criteria and broad areas we would expect criteria to include.

As described above, a scale developed around the Categories of the Standards of Excellence will be used to determine a CAA's level of achievement from threshold to high performance. Incorporated in this scale will be requirements of a Community Action Plan for identifying community needs as they relate to poverty reduction, community resources to help with poverty reduction, the strategies the CAA will implement and the outcomes that will be accomplished. As an example: a CAA with a Community Needs Assessment and a resulting Community Action Plan would meet the threshold requirement, but a high performing agency integrates both these required elements into a formal Strategic Plan, with goals, measures and metrics.

The ROMA Cycle process will be fully implemented at all levels of each CAA to incorporate the core activities identified in Information Memorandum 49 into the threshold criteria. Information Memorandum 82 requires CAAs to operate using a Tripartite Board and is essential as effective CAAs promote the unique anti-poverty leadership, action and responsibilities assigned by law. Among others, the board is responsible for oversight and governance of the CAA which should also be integrated into the threshold criteria. More specific recommendations on implementation appear in the ROMA section of this document.

The above mentioned scale will be used to measure a CAA's performance implementing the requirements of IM 49 and 82. Peer-to-peer assessments could be used to improve performance and achieve expected results.

C. Time-line and process for developing specific criteria and refining process.

The effective date to implement the threshold and high performance criteria is October 1, 2012. All national partners, states, state associations and local entities will work together to develop and refine the criteria with the October 1, 2012, effective date in mind.

Promotion of High Performance and Accountability via Establishment of Performance Criteria for States

Work Group: Bill Brand, Joe Devaney, Pat Steiger, Arnie Anderson, Dalitso Sulamoyo, Jeannie Chaffin

Note: This was an area where there was not universal agreement on the subcommittee's recommendations.

Assumptions: We will only develop recommendations that we believe will help strengthen the network and our ability to serve low-income families. Most of what states should be required to do is already identified in the CSBG Act or federal guidance, but needs more enforcement.

To promote high performance and accountability by state CSBG offices, states must have clear, measurable and enforceable standards (standards must be observable, countable, and enforceable). Standards must include:

- 1) Getting the money out timely. States must be required to issue contracts and make payments to CAAs in a timely manner. An assurance related to the State timely release of the funding should be added to the CSBG Act. A State's plan to achieve this must be addressed specifically in the State Plan and assurances. Failure to comply would subject the state to penalties as described in #5.
- 2) Conducting timely and effective monitoring of eligible entities. Monitoring of eligible entities is a critical role for states. To achieve the goal of effective monitoring:
 - a) States must be required to identify in their State Plan an annual monitoring plan that includes a monitoring schedule, the staff assigned to monitoring, and training plan for staff responsible for monitoring. States must notify OCS of a change to the monitoring plan.
 - b) OCS, in partnership with the community action network, must develop a model monitoring instrument that is required to be utilized by states in monitoring eligible entities. The model must include a core set of mandatory issues to be monitored, based on the CSBG statute and OCS guidance. The instrument may be customized by individual states.
 - c) States must be required, at a minimum, to review eligible entities' annual independent financial audit and approve the resolution of any audit findings.
 - d) OCS, in partnership with the community action network, must develop and deliver training to states on implementing the model monitoring tool.
 - e) States must be provided adequate resources necessary to perform their functions.
- 3) An effective protocol for the termination of funding of an eligible entity. While a process for the termination of funding of an eligible entity exists in the current CSBG statute, it is a lengthy and time-consuming process. To assure an effective process:
 - a) the national partners, specifically including CAPLAW, will explore alternatives to the current statute that would provide eligible entities with appropriate due process

and States the appropriate authority to act in a timely manner to terminate funding when necessary.

- b) a process must be established to provide authority to States to act swiftly to suspend funding to an eligible entity in cases of suspected fraudulent activity.

This examination of, and recommendations for possible changes to, the process for termination of funding, will be completed by December 1, 2011.

- 4) An effective mechanism for monitoring and enforcing standards required of States, and consequences for not meeting standards. Although OCS has made progress recently in monitoring of States, the capacity for regular, ongoing, and comprehensive monitoring of States by OCS does not currently exist. An alternative mechanism for monitoring of States must be developed. A model similar to Head Start that would include a peer monitoring component of qualified experts from States, CAAs, and other professionals to supplement the federal staff, or an independent monitoring entity must be considered.

Any monitoring entity must have the necessary skills, knowledge, and experience regarding CSBG and the administration and management of federal funding sources to effectively monitor states. Adequate resources must be directed to the monitoring and enforcement functions and training and technical assistance necessary to implement the monitoring standards on an ongoing basis. The monitoring entity must have the authority to monitor, but HHS would maintain responsibility for corrective action and enforcement.

- 5) Meaningful consequences for poor performance by a State. After corrective action has failed and due process exhausted, States found to be non-performing must have financial penalties imposed or funding suspended and funding provided to eligible entities through an intermediary entity (similar to Head Start). Financial penalties must be applied to State administrative funding. Technical assistance must be provided to the State to correct deficiencies with the goal of the state resuming its responsibilities.
- 6) The Work Group did not adopt a specific recommendation on the following issue, but the sentiment was basically that: State standards must be sufficiently explicit, measurable and observable to allow a party to effectively challenge OCS enforcement, or lack thereof, in court.

Effective and Consistent Federal Oversight Subgroup

Work Group: Anita Lichtblau, Teresa Cox, Linda Snead, Arley Johnson, Jeannie Chaffin, Dominique Turrentine, Andy Cruz, Howard Gesbeck

A. Current HHS oversight authority and responsibility

State Plan and Assurances. The federal requirements of the CSBG are primarily enforced by the federal government through a set of thirteen assurances included in the application and state plan, which must be signed by the governor and submitted by the state to HHS every

one or two years in order for the state to receive CSBG funding. 42 U.S.C. 9908. The CSBG Act permits HHS to require additional information in the state's application. The state plan must include information describing how the state intends to carry out the assurances. 42 USC 9908(b)(13). The practice, as stated in the Model Plan developed by OCS, is for HHS to review the state plans to ensure that the proper assurances are included in the plan. Section 9908(d) of the CSBG Act gives HHS authority to "prescribe procedures for the purpose of assessing the effectiveness of eligible entities in carrying out" the CSBG purposes."

OCS Evaluations of States. The CSBG Act requires HHS to "conduct in several States in each fiscal year evaluations (including investigations) of the use of [CSBG] funds ... in order to evaluate compliance with the provisions of [the CSBG Act], and especially with respect to compliance with [the state plan assurances]." HHS is also required to submit, to each state evaluated, a report containing the results of the evaluations, and recommendations for improvements. On receiving the report, the state must submit to HHS a corrective action plan. The results of the evaluations must be submitted annually to the House Committee on Education and the Workforce and the Senate Committee on Labor and Human Resources. 42 USC 9914(c).

State Audits. Each state is required to have an annual audit of the CSBG funds it has received and distributed, consistent with the Single Audit Act requirements. Within 30 days of completion of the audit, the state must submit it to, among others, HHS. 42 USC 9916(a)(2).

Repayment and Withholding. The state must repay to the United States amounts found not to have been expended in accordance with the CSBG Act, or HHS may offset such amounts against any other amount to which the state is or may become entitled under the CSBG Act. The Block Grant regulations provide that if the state does not voluntarily repay the funds, HHS will undertake recovery of them. 45 CFR 96.32. After providing notice to the state and an opportunity for a hearing, HHS may withhold CSBG funding from a state if it does not use the funds in accordance with the CSBG Act, including the assurances. 42 USC 9916. HHS may withhold funds until it finds that the reason for the withholding has been removed. 45 CFR 96.53.

Complaints and Investigations. HHS is required to respond in an expeditious and speedy manner to complaints of a "substantial or serious nature" that a State has failed to use funds in accordance with the provisions of the CSBG Act, including the assurances. The Block Grant regulations further require that HHS provide a written response within 180 days of receipt of the complaint. If HHS cannot provide a final resolution within 180 days, it must explain why it needs more time. A complaint of a failure to meet any one of the assurances provided that constitutes disregarding that assurance is considered to be a complaint of a serious nature. Whenever HHS determines that there is a pattern of complaints of such failures from any state in any fiscal year, HHS is required to conduct an investigation of the use of CSBG funds by that state in order to ensure compliance with the provisions of the CSBG Act. 42 USC 9916. In resolving an issue raised by a complaint or an audit, HHS will defer to the state's interpretation of its assurances and the CSBG Act provisions, unless the interpretation is clearly erroneous. 45 CFR 96.50(e).

Review of terminations and reduction in funding. HHS has a significant role in reviewing and potentially blocking the state's termination of or reduction in funding to an eligible entity. Prior to a state taking such action, the eligible entity has the right to review by HHS of the state's decision. HHS may overturn the State's decision if the State did not follow the required procedures and/or no "cause," as defined by the CSBG Act, justified the action. 42 USC 9915. In addition, if the state does not comply with the steps required to terminate or reduce funding to an eligible entity, such as holding a hearing prior to termination, HHS may fund the entity directly and withhold from the state the amount that it pays directly to the entity.

Political activity restrictions. The CSBG Act requires HHS, after consultation with the federal Office of Personnel Management, to issue rules and regulations to enforce the Act's political activity restrictions, which must include provisions for summary suspension of assistance or other action necessary to permit enforcement on an emergency basis. 42 USC 9918.

Inherent authority. A federal awarding agency has an inherent right and obligation to monitor and oversee the grants that it awards. *See* B-20381, 64 Comp. Gen. 582 (1985).

OMB Circulars and CSBG Terms and Conditions. The CSBG Act was amended in the 1990s to require states to ensure that eligible entities are subject to OMB cost and accounting standards. 42 USC 9916(a)(1)(B). The Office of Community Services' Model State Plan and the CSBG Terms and Conditions of the awards to the states specifically require states to ensure that eligible entities comply with OMB Circulars A-110 and A-122. This provides the federal government, through the use of its financial and administrative requirements, with additional oversight capability over the states, and indirectly, over the eligibility entities. The Terms and Conditions also contain additional requirements to which states must adhere to receive funds.

B. Barriers to Enforcement

The group identified several barriers to more effective federal oversight. Although the laws provide HHS with a number of tools, the fact that the law no longer requires, but only permits, HHS to provide direct funding to an eligible entity when a State has violated the funding termination requirements, was felt to take teeth out of the provision. OCS has also indicated that it is not in the position to direct fund an eligible entity, despite the legal provision authorizing it to do so.

Other barriers mentioned were the lack of a permanent OCS Director over the past two plus years and shortage of staff to oversee the program. Also, the lack of review of the state plans other than to ensure that the assurances and other required information was included in the plan, as opposed to going behind the plan document, was mentioned as an obstacle to more in-depth oversight of the states. Lack of enough staff with the necessary expertise to conduct sufficient monitoring of states on a regular basis was also mentioned, as well as timely reports back to the states monitored. It was also unclear how or if OCS required repayment of improperly spent CSBG funds or withheld funds from States that were not

complying with the law and their responsibilities. For example, there did not seem to be a process in place to penalize states that failed to distribute funds in a timely manner. A barrier to this process may be the perceived lack of the means of penalizing the state without unfairly penalizing the eligible entities at the same time.

Another obstacle is the timeliness of a response by OCS to complaints and a lack of transparency about how the complaints are resolved. Finally, there does not appear to be a formalized method of sharing information among the community stakeholders, including OCS, on critical issues on a regular basis. Few Information Memoranda have been issued recently and there sometimes seems to be inconsistent, and sometimes incorrect, informal guidance provided by various OCS staff on these issues. The higher level of communication that took place in the beginning of ARRA seems to have dropped off since then.

C. Recommendations

- Change Act's language concerning direct funding of eligible entities back to mandatory, rather than discretionary.
- Require states to distribute funds to eligible entities within thirty days (or a period explained and proposed in a State's Plan)¹ of receiving it from the federal government and financially penalize those who don't.
- By regulation or statute, set up an advisory council to OCS, or a similar group, that will meet or confer by phone on a set, regular schedule, such as monthly, to discuss common issues faced by CAAs.
- Require posting of OCS Monitoring reports on its website.
- Include in statute language concerning frequency of monitoring of states.
- Provide a mechanism for penalizing states that does not at the same time penalize the eligible entities, such as requiring that any repayments be made from non-CSBG funds and/or a readily-available means of direct funding eligible entities where the state is not complying with its responsibilities, and/or cutting the amount of administrative funds paid to the state.
- Enforce 180-day response period to complaints, and consider including language in statute that requires quicker turn-around for direct funding requests and/or complaints for more pressing complaints.
- Require OCS to notify state in writing when they have accepted the state plan.

Standard Implementation of ROMA

Work Group: Barbara Mooney, Natalya Lozovaya, Lil Dupree, interviews with ROMA trainers.

ROMA currently serves as a local diagnostic tool to fix, improve and redirect funding to other programs. The four core ROMA Activities of assessment, planning, implementing and evaluating will be looked at with an eye toward how they can be used as performance criteria

¹ There are significant differences between States in this area, and specific input as to the processes in each State would be welcome.

and how results can be used at the local, State and Federal level to promote what works, identify promising practices and effectively target resources.

A. What is needed to standardize the ROMA Core Activities identified in IM 49 in language that can be recommended for enhancements to the CSBG Act? Is it possible to use Standards of Excellence to articulate requirements around the 4 ROMA Core Activities?

The first area that the committee raises is the clarification of what the “ROMA system” is:

- It is referred to in IM 102 in the Performance Measurement section only.
- In Standards of Excellence, six national ROMA goals are cited (2.4) as an integral part of strategic planning, indicates staff should know about ROMA (5.4), identifies measurable (ROMA) objectives (6.6) as an item for consideration, and refers to a focus on how agencies integrate ROMA in category 7. However, in none of these places is any understanding of what is meant by “ROMA” provided.

B. Identify what “standard implementation of ROMA” means/looks like. What would be the steps and time line for full development of a national implementation strategy?

The discussions produced significant agreement that the terms used in a variety of “official” and well used documents (IM 49, IM 82, IM 102, Standards of Excellence, ROMA Cycle) are not consistent in the way they are used in the documents. In other words, the concept of “standardized implementation” which was proposed for completion in 2003 (as stated in IM 49), has not occurred. Standard ROMA implementation must include:

- Assessment of community needs and resources and use of agency data;
- Planning is the use of the CAA mission statement and assessment data to identify results and strategies;
 - The Needs Assessment question in IM 102 provides a wonderful summary of the assessment process and intent of using the assessment to move to planning to provide services that produce outcomes. However, the question for this section (page 17) jumps to “Describe how outcomes are measured based on the needs identified in the Community Action Plans.” It appears that there are steps missing in the move from identified needs to measured outcomes: identifying which needs can/should be addressed by the local eligible entity, identifying which outcomes are reasonable, setting targets, selecting appropriate strategies, and then identifying measurement tools and methods. IM 49 speaks to connecting activities of the agency to outcomes (in the reporting activity) but this process appears to need to be pieced together from documents (or can be gathered from the Introduction to ROMA curriculum of the National Peer to Peer project).
- Implementation is to carry out the services and strategies to produce results; Achievement of Results is the process of observation, reporting progress and reporting results;

- Only the Standards of Excellence address human resource issues in any detail. We all know that the implementation of ROMA to date has had much to do with the individuals in various positions in local agencies, associations and state offices who have knowledge, skills and motivation to assure best practices occur.
- Evaluation is the process of using the data by comparing it to benchmarks.
 - It is clear that all documents have some focus on reporting results, but the “analysis of the data” step appears to be missing. IM 49 does ask for connections but nowhere does the analysis of the data appear. How do agencies use the “ROMA data” to continue the cycle? How does the data become a part of the assessment and planning for the next period of performance?

Board involvement is a part of ROMA implementation. It appears to be a key in the core activities in IM 49. It is also a highlight in IM 102, which requires a Tripartite Board to be “fully functional” – and could refer back to the detailed information regarding boards found in IM 82. The Board’s responsibility in the ROMA cycle requires:

- Development of the needs assessment and clarifying the CAA mission;
- Planning the annual and long term strategic planning activities of the CAA for anti-poverty purposes;
- Implementation of the strategies so board members stay informed of CAA progress, programs and activities and ensuring effective fiscal controls; and,
- Evaluation to focus attention on results in all phases of CAA program activity.

A third area of discussion centered around “what is currently happening across the country.” ROMA Implementation is uneven across the country. Some feel that if they are providing clear data on outcomes via the NPI report that they are “doing ROMA” adequately. And in some ways, if the outcome is the end product and good outcomes are being reported, then isn’t this what we are seeking?

This gives rise to the question: what is good performance? We do not believe that we currently have measures for performance that can be applied to compare agencies, as there are many factors that influence performance. These include:

- Size of agency
 - size of staff (qualifications of staff, etc.)
 - amount of funding available from multiple sources,
 - geographic area covered
 - kinds of services provided
 - quantity of services provided (number of customers, frequency/intensity of service, duration of service)
- Economic conditions of community
- Other resources in the community
- Demographic information related to those being served (“hard to serve” populations, with specific challenges, etc.)

Several states have been recently involved in surveying their agencies to identify agency capacity strengths and challenges. In some states this has actually been called a survey of ROMA implementation, and in other states it has been part of a Pathways to Excellence process. In other states it has been billed as a more general agency “self-study” regarding capacity and performance. Also, the Community Action Partnership has sent out T/TA needs assessment surveys to associations and agencies, that has many elements of both ROMA implementation and Excellence.

A final area of consensus is that there is a need for more detailed information regarding what is expected (not just “a needs assessment”), that should be clear, simple and easy to use. As we are all familiar with the concept of the matrices (as developed by MATF and in current use by many agencies) perhaps that kind of format could be used. Elements from all of the currently used documents should be selected and refined.

Recommendations:

- **Clarify what is meant by ROMA by July 1, 2011**
- **Research and produce a report that includes a national snapshot of what is happening across the country, identifying strengths and areas for improvement by December 1, 2011**
 - *Note: This should be done prior to #2, so that a clearer picture of what is expected can emerge from the “best” examples.*
- **Clarify what is meant by Standardized ROMA Implementation.** Draft (for first round of exploration in the field) identification of exactly what is meant by standardized ROMA implementation by October 1, 2011, and a final definition/description by March 1, 2012.
 - *Note: If recommendation #1 is complete, then the elements of ROMA can be operationalized to become a working definition of Standardized ROMA Implementation. There are a number of current efforts being done in states across the country that could be the basis of this. See above for details.*
- **Establishment of indicators** that could support each of the elements of the suggested Standardized ROMA Implementation with an effective date of October 1, 2012 in mind.

Use of Evidence Based Programs in CSBG

Work Group: Tom Tenorio, Vaughn Clark, Ken Ackerman, Cashin Yiu, Dominique Turrentine, Tabitha Beck, Denise Harlow

Charge:

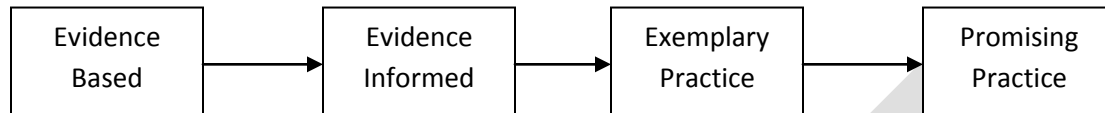
The CSBG Working Group will look at how evidence-based programs are currently being utilized in CSBG and make recommendations for how evidence based efforts can be promoted in the future.

- A. Develop recommendations for how HHS might support the development of an “evidence base” for CSBG.

- B. Begin developing a list of first level ideas of specific practices we can recommend HHS might want to invest in for establishing an evidence base for CSBG.

Overview

The concept of “evidence-based” programs falls at one end of a continuum as defined by HHS:



While some CAAs do implement programs that are fully in the evidence-based domain such as *Nurse/Family Partnership* and *Parents as Teachers*, these programs are operated by a small subset of CAAs based on availability local/state funding streams and the range of providers/competitors in their locality. Most CAAs, however, operate programs that fit into the evidence-informed, exemplary practice, and promising practice domains. Often these are not documented as such but with research investments could be shown to be evidence-based or at least evidence informed. CAAs implement highly effective practices across the country and families achieve success every day; however, our challenge it to use the research tools available and work with OCS to structure CSBG resources to fully document it.

The ability to conduct the rigorous research necessary for evidence-based would take considerable investment but conducting research to demonstrate that many CAA programs are evidence informed or exemplary is within the reach of HHS. CAAs across the country have worked with academic institutions and other third party researchers and these relationships that can built upon as a model. Cost is often a prohibitive factor, but finding ways to maximize research investments across the national network has significant potential to document what we know to be true: *Community Action knows what works, uses a service delivery model that engages the full community in addressing poverty, and implements programs effectively and efficiently in every corner of the country that moves families toward self-sufficiency.*

In addition to cost, the challenge of identifying specific CSBG-funded initiatives or strategies to research is also significant. In addition to being used as seed funding for new programs, CSBG is often used to support and expand existing programs and complement it with other funding streams to meet community needs. It is important to implement an evaluation model that addresses the unique nature of CSBG as a resource in these blended initiatives. In addition CSBG is often used for administrative supports that allow CAAs to function and operate as effective nonprofit organizations, which would also benefit from evaluation, as HHS uses the amount of CSBG used for administration as a performance measure.

Recommendations

1. **HHS should invest funding to assess the validity and replicability of specific existing CAA services such as VITA/EITC, Asset Building, and IDAs.**
 - a. Some research has been done on these programs that can be built upon. For instance, MASSCAP did a project that assessed 10 CAAs work in EITC and financial literacy 4-5 years ago; this could be expanded.

- b. EITC/VITA programs are often implemented/expanded using CSBG funds. Given the use of volunteers and partnerships with banks, United Ways, universities, and others, CSBG is often used to support these efforts. CSBG was used to support these programs prior to OCS CSBG grants and before the IRS investments of recent years.
 - c. VITA/EITC programs are provided by a wide distribution of CAAs across the US in rural, suburban, and urban environments.
 - d. The AFI grant program via HHS/OCS has provided for asset development and IDA development. In addition, many CAAs have developed similar programs at local levels without AFI investments and have a track record of success such as lower foreclosure rates during the current recession than other home purchasing programs.
2. **HHS should invest funding to document through valid research methods the effectiveness of the Community Action service delivery model.** This model includes, but is not limited to, community assessments to identify needs, locally driven tri-partite boards setting direction, locally-developed Community Action Plans based on the determined needs, and the provision of bundled services to families (as opposed to a single service).
 3. **HHS should invest funding to research the validity of CAA program development models such as Family Development, Transitional Housing, Community Economic Development, and Community Development.** In the Community Action field these are seen as promising practices and evidence informed but lend themselves well to further research to demonstrate evidenced-based and proper documentation of the research they were built upon.
 4. **Third parties should be a partner in the research of CSBG funded programs and invested in by HHS.** This may mean academic institutions or national think tanks like the Urban Institute. Partnerships with foundations such as Annie E Casey who work in these areas should also be considered.
 5. **HHS should invest in researching the qualities of CAAs and/or the circumstances of CAAs that currently used accepted evidence-based or evidence-informed practices.** There may be unique organizational structure, governance, planning, or other components that may promote the use of evidence-based programs within some CAAs that could then be built upon in other CAAs.
 6. **Work with the Regional Consortia, Center for Excellence, and T/TA Clearinghouse grantees to provide training and technical assistance in how to implement research techniques effectively.**

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