

The Community Action Network is responding to the Administration's call for innovation, high performance and accountability for the Community Services Block Grant (CSBG). Our aim in this summary is to provide concrete initial recommendations in five areas. A detailed plan is being developed over the coming months with the active engagement of national and state associations, state officials, and Community Action Agencies around the country. These plans are being designed with a target implementation date of October 1, 2012.

Vulnerable Americans deserve the highest quality services and these services must be accessible to all communities – urban, rural and suburban. The CSBG Network that covers 99% of U.S. counties brought necessary services to nearly 22 million Americans in 2010. In order to make these services accessible throughout the country, this Network depends on a federal, state and local collaboration in which each level plays a critical part. At the local level, each Community Action Agency and CSBG eligible entity offers multiple and coordinated programs to address specific local needs in their community. States are responsible for administration and oversight to support and encourage high performance at the local level. The federal Office of Community Services has the responsibility to support and monitor the states.

Community Action Agencies are held accountable for how they use federal dollars through rigorous budgeting, program and agency audits and finally monitoring at the state and local level. Within the framework of the Six National Results-Oriented Management and Accountability (ROMA) goals, set out in OCS Information Memorandum 49, agencies set goals and record results. States have been gathering this data for 17 years and summary and detailed reports have been available for each year since 1998.

An example of our results is that nearly 650,000 previously unemployed people obtained jobs as a result of Community Action assistance over the last five years. Within the same timeframe, Community Action helped nearly 64,000 people gain a college degree.

We have heard, understand and support the Administration's call for funding what works, so in that context, and with the expertise of a wide group of Network members, we present the specific recommendations below.

1. High Performance and Accountability for Community Action Agencies

Develop clear criteria for a matrix of performance standards that will establish a threshold for minimally accepted achievement as well as advancing and excelling standards for which Community Action Agencies can strive. The Community Action Partnership Baldrige-based Community Action Categories of Excellence provide an existing, tested framework on which to build, and will incorporate the core ROMA activities, see number 4 below. In parallel with this performance matrix, a process will be delineated so that Community Action Agencies have a timeframe and technical assistance in which to meet these standards, similar to the model in use for Head Start, but without a mandatory percentage of agencies required to compete on an annual basis. Details and final recommendations for the designation/competition process to be instituted when a Community Action Agency fails to meet the thresholds and after a technical assistance phase will be forthcoming. The effective date to implement performance criteria and processes is October 1, 2012.

2. High Performance and Accountability for States

Develop for States clear, measurable and enforceable standards originating from State administrative responsibilities. Most of what States should be required to do is already identified in the CSBG Act via the State assurances, however, a need exists for improved federal enforcement of these activities. Further work is needed, but initial discussions on State standards center on the understanding of state processes and their impact on the timely issuance of contracts and payments to Community Action Agencies; conducting timely and effective monitoring of Community Action Agencies and establishing more uniform monitoring practices; and a more effective statutory protocol for the termination of funding of a Community Action Agency.

Federal expertise and capacity challenges require new solutions and the subcommittee recommends examining successful models in other federal programs such as Head Start. Creating final recommendations in areas of federal enforcement such as effective mechanisms for monitoring State responsibilities, and any possible new standards will need additional discussion among the CSBG Network and ACF.

Finally, just as the Working Group discussed consequences for eligible entities' poor performance, consequences for poor State performance must also be considered and included. Concerning State performance, strengthening CSBG requires technical assistance when poor State performance is identified and strong enforcement of real consequences must be employed, including financial penalties if performance does not improve to meet agreed upon standards. Recommendations in this area can be developed and completed by December 1, 2011.

3. Effective and Consistent Federal Oversight

Just as the Working Group views local and State accountability as the path to high performance, increased federal accountability is also needed. The CSBG Act provides HHS with a number of tools to oversee and monitor States. The CSBG Act State Plan with its various State assurances sets out State responsibilities and requires HHS to evaluate State compliance with the provisions of the Act. In addition, the CSBG Act requires HHS to respond in a timely manner to serious complaints that a State has failed to use funds in accordance with the CSBG Act. The CSBG Act and other Federal Regulations and Codes provide a basis for HHS to withhold or request repayment of funds found not to have been spent properly. Identified recommendations include changes to the CSBG Act that increase the frequency of federal monitoring of States and mechanisms that penalize States for non-compliance, but not at the same time penalize Community Action Agencies. Strengthening enforcement, responding timely to substantive complaints, using existing repayment or withholding mechanisms and establishing better mechanisms are critical for increasing accountability.

Other subcommittee recommendations in this area could be addressed by HHS via changes in process and program implementation. For example establishing regular meetings of CSBG Network partners to confer on common, critical and emerging issues could help facilitate joint problem solving. Making OCS State monitoring reports available via the web and notifying States in writing when the State Plan has been accepted could improve communication and shared understanding.

4. Targeting resources toward the most promising practices through full implementation of Results Oriented Management and Accountability (ROMA)

Born as a result of the Government Performance and Results Act of 1993, ROMA is more than a means to provide clear data on outcomes, it is about sound management practices. It is also a process of assessment, planning, implementation and evaluation that promotes what works, identifies promising practices and helps effectively target resources. Incorporating the intent of the GPRA Modernization Act (2010), following a national snapshot about how ROMA is being used around the country, indicators will be established to clearly define steps that Community Action Agencies will need to take for full ROMA implementation to increase the use of performance information in program decision-making. This will be completed by October 1, 2012.

5. Creating an Evidence Base for CSBG

CSBG is more than a program; it is the venture capital to address community needs where market forces and the private sector are not applicable. The classic evaluative based approach needs adjusting to document the impact of CSBG. We recommend that ACF through its expertise and funding resources commit to working with the CSBG Network to craft a plan to examine the CSBG service delivery model. This would include working together to engage academic or research organizations in research on CSBG. Additionally, we recommend the plan include a review of evidence based, exemplary practices and common national practices (i.e. VITA/EITC) that are presently used by Community Action Agencies. Finally we suggest ACF work at a higher level with CSBG Cooperative Agreement Grantees and bring in ACF expertise in the area of evidence based research to help grantees tasked with improving CSBG performance make the most of current ACF investments to promote evidence based, evidence informed and exemplary practices.

The Community Services Block Grant serves as the venture capital for communities to address their critical needs, and is the federal government's commitment to a national infrastructure to address poverty. Through CSBG, the federal government has made a significant and successful investment in addressing poverty across America. The portfolio of services at the local level changes and adapts to respond to varied economic conditions, including the recent recession. From emergency assistance to housing to early childhood education to employment and training, Community Action Agencies are part of, are governed by, and are integral institutions in their communities. This history gives us a strong base upon which to build as we reinforce robust systems for accountability and oversight and increase results for vulnerable Americans.