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Timothy R. Warfield

June 30, 2011

Mr. Mark Greenberg
Deputy Assistant Secretary for Policy
Administration for Children and Families
U.S. Department of Health and Human Services
370 L'Enfant Promenade, S.W.
Washington, DC 20447

Dear Mr. Greenberg:

Thank you for soliciting our feedback. The Administration has called for increased accountability and competition. NASCSP fully supports increased accountability, competition, and performance for CSBG-funded entities. CSBG Act language and policies must strengthen the accountability structures of federal, state and local processes.

What we strongly oppose is the proposed 50% reduction in CSBG funding which would punish the poor. Such a reduction would further devastate the lives of over 23 million Americans seeking a tenuous toehold in the middle class. It would severely jeopardize the ability of States and eligible entities to pursue higher levels of performance. Any reform of CSBG must maintain a national network of entities with the sole purpose of reducing poverty, promote high quality service delivery without raising administrative costs, as well as promote stability and continuity for local organizations and their customers. NASCSP strongly recommends that:

- CSBG must be kept intact. It is not merely a program nor a funding stream. It is a unique model that commissions local organizations (CAAs) to fight poverty comprehensively. The practices required of these entities are built on a sound theoretical framework which recognizes that the causes and conditions of poverty are multi-faceted, complex, and that they operate at the systemic, community, and individual levels. Currently, only CSBG eligible entities provide:

1. Periodic community needs assessments: CAAs are a principal source of information and advocacy for poverty reduction.
2. Community-based governing boards: The unique three-part board design of CAAs brings together civic leaders, local businesses, and low-income people to problem-solve together.

444 North Capitol Street, NW Suite 846 Washington, DC 20001
Tel (202) 624-5866 Fax (202) 624-8472
www.nascsp.org

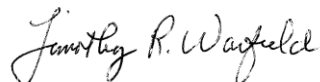
3. Mobilization and coordination of federal, state and local resources: At the core of CSBG is a mandate for eligible entities to coordinate the disparate menu of available programs. These partnerships result in meaningful outcomes and reductions in poverty.
 4. Comprehensive outcome management and reporting: The CSBG network has carefully tracked its outcomes since 1994. Among the many outcomes reported, 650,000 unemployed people obtained jobs and 64,000 people gained a college degree over the last five years with support from Community Action.
- CSBG funding should only be made available to high performing eligible entities. We do not support complete elimination of CSBG eligible entities from any geographical areas. CSBG entities operate in 99% of U.S. counties. It is essential to continue a national commitment to place-based solutions to the intractable causes and conditions of poverty in States via local, designated eligible entities.
 - The Federal government must more clearly articulate CSBG goals and objectives for reducing poverty and hold States and eligible entities accountable.
 - High performance can be supported through the following reforms:
 1. **Hold States and local agencies accountable for performance:** Create a means of competition for designating eligible entity status when an eligible entity underperforms.
 2. **Promote high performance by rewarding States and eligible entities:** Create a means to reward States and eligible entities with additional CSBG or other funding when high performance is achieved.
 3. **Allow State flexibility to design the competitive process:** Competition need only occur when an eligible entity fails to meet performance expectations and fails to correct the issues in a timely manner. Per the Block Grant design, states can outline the specifics of their process and criteria in their State plans. CAA performance demonstrates an ability to succeed in a competitive market. In fact all CAAs must compete on the federal, state and local level for the majority of their funding. In 2009 CSBG funding was 6.5 % of funding in the CSBG Network, other federal funding was 69% and State funding was 10%. Local and private funding, which are often very competitive, totaled 14.5%.
 4. **Encourage the CSBG network to identify performance standards:** Establishing performance standards using existing tools and resources already developed by the network and expanding them is achievable. NASCSP expects performance standards to include a mix of current compliance requirements and high performance criteria. Achievable standards should be designed for all eligible entities regardless of geography, size and funding level. NASCSP's State members are already working

internally and with other CSBG Network partners to identify details for a performance framework.

- 5. Increase accountability at the State and Federal levels:** The Office of Community Services must provide enhanced oversight, leadership and enforcement of State assurances and State plans. States welcome strong support and oversight, and in turn need strong oversight authority of their own to properly manage and administer CSBG. Mechanisms and tools to enforce accountability, such as a State's authority to recapture unspent eligible entity funding and redistribute it are key to achieving accountability.

Every State wants to fund high-performing eligible entities. It's what low-income individuals and communities deserve. NASCSP and its members welcome the opportunity to work with DHHS to provide economic opportunity for all Americans, especially the most vulnerable. We look forward to meeting with you soon to discuss these issues in greater detail and identify a path forward.

Sincerely,

A handwritten signature in black ink that reads "Timothy R. Warfield". The signature is written in a cursive style with a large initial 'T' and 'W'.

Timothy R. Warfield
Executive Director
National Association for State Community Services Programs