

A SELF-ASSESSMENT TOOL FOR STATE CSBG OFFICES

INTRODUCTION: The following consists of two assessment tools. Part 1 is a checklist covering regulations and management. Part 2 takes a somewhat broader viewpoint and is intended to provide the user with an assessment of his/her office's capacity to implement a high quality Community Services Block Grant (CSBG) Program. It covers resources, policies and practices that have proven to contribute to the implementation of a sound, performance oriented program.

SELF-ASSESSMENT TOOL FOR STATE CSBG OFFICES: PART 1

REGULATORY COMPLIANCE AND MANAGEMENT	Location	Obtained Yes=Y No=N	Comments
All state level staff should be familiar with and have easy access to the following:			
Copy of the CSBG federal legislation.	Available from the HHS/OCS website: www.acf.dhhs.gov		
Copy of any state level CSBG legislation and other legislation or regulations governing non-profits.	State statutes, rules and codes.		
Copy of federal Office of Management and Budget (OMB) Circulars A-87, A-102, A-110, A-122, and A-133. They constitute the uniform federal grant management rules. There are a few areas of conflict among these circulars and the CSBG legislation. Legislative provisions generally take precedence over OMB circulars. However it is recommended that when such conflicts are noted the OCS Information Memoranda or federal OCS staff should be consulted.	These are available on the OMB website: www.whitehouse.gov/omb		
Office of Community Services Information Memorandums.	Available on the OCS website and NASCSP website. www.nascsp.org www.acf.hhs.gov/programs/ocs		

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REGULATORY COMPLIANCE AND MANAGEMENT	Location	Obtained Yes=Y No=N	Comments
Copy of the state's formula used to allocate CSBG funds among the CAAs. This document should illustrate how allocations are calculated and include the current and prior year's allocation by CAA. Commonly, funds are allocated by states based upon the numbers of low-income persons or unemployed in the CAA service areas or similar factors.	Formula might be identified in state statute. Information also might be in State Plan.		
Copy of the approved CSBG state plan and assurances.	Copy of the plan must be submitted either on an annual or biannual basis to HHS/OCS		
Copy of financial reports (SF269) and program reports submitted to OCS/HHS. SF269 is due annually after the end of the program year along with the Annual Report (CSBG/IS serves as the annual report).	HHS Website for forms. www.acf.dhhs.gov/programs/ocs		
Copy of last NASCSP CSBG Information Survey (submitted to NASCSP each year by March 31) submitted by the state.	Forms are made available on NASCP website. If a copy of the information submitted by the State is needed, see NASCSP staff.		
Copy of the state's "boilerplate" grant contract. This is the standard language each state uses in all of its CSBG contracts. These are usually based upon a standard set of administrative requirements set by each state and consequently vary from state to state.			

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COMMUNICATING POLICY AND PROCEDURE TO THE COMMUNITY ACTION AGENCIES AND OTHER CSBG GRANTEES	Describe Current Practice	Comments
<p>Memorandums, Directives, Guidelines, and Procedures. Various standardized methods or tools for the purpose of communicating policies, procedures and similar information to the CAAs. Memorandums or other tools should be prepared by state staff, however some states may select to use OCS issued Information Memorandums in some cases. Compliance with these policies would be a standard provision in each CSBG grant contract. Individual memorandums should be issued on an as needed basis. The number and type of memorandums will vary from state to state depending on each states policies, procedures and methodology for management of the CSBG. CSBG directives, memos, guidelines, procedures etc. may cover some of the following topics:</p>		
<p>CAA Board Composition. Non-profit CAA board composition requirements and board functions and responsibilities. Address the policy role of the board and principles of due diligence, obedience and loyalty and include requirements for meetings, written by-laws, conflicts of interest policies, orientation of new members and regular training of all members. (*See OCS IM 82)</p>		
<p>Public CAA Board Composition. Public CAA board composition requirements and board functions and responsibilities. This should include the role of the board in the development, planning, implementation, and evaluation of local CSBG programs as specified in the federal CSBG legislation. (*See OCS IM 82)</p>		

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<p>Contract Modification Procedures. Procedures to secure approval of contract amendments, modifications or changes in budget line items. These procedures should cover any limitations on the number of changes during a contract period you wish to impose, the extent of line item flexibility you wish to allow, any deadlines for submission and other procedural guidelines.</p>		
<p>Invoicing and Requests for Payment instructions. Provide process and policies CAAs and other grantees are to use to invoice for grant funds. Include requests for advance payments, deadlines for final invoices, allowable costs, line item flexibility, and recovery of costs after a contract is closed (if you want to allow this). Emphasize the timely submission of invoices and the need to allow adequate time to process the invoice.</p>		
<p>Funding Termination and Reductions. Establish and communicate procedures for termination or reduction of CSBG funding to eligible entities in accordance with the CSBG Act.</p>		
<p>Designation and Redesignation of Eligible Entities. Establish and communicate procedures for designating eligible entities in accordance with the CSBG Act.</p>		
<p>Administrative Costs. Define administrative costs and set limits on them. Consult the CSBG federal legislation and the OCS Information memo entitled “Definition and Allowability of Direct and Administrative Costs.” Some states link administrative cost ceilings to the amount of other funds leveraged with CSBG dollars. (*See OCS IM 37)</p>		

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<p>Indirect Costs. Set procedures for the approval of indirect cost rates. Not all states approve indirect cost rates. Some states simply authorize the use of any federally approved rate that the CAA or other grantee may have secured. Bear in mind that indirect costs may or may not include administrative costs. Indirect cost rates are simply a means of apportioning shared costs among several programs. (*See OCS IM 20)</p>		
<p>Customer Privacy: Requirements to protect the privacy of CSBG customer information. This should be a written policy. It should state how access to customer information by unauthorized persons will be prevented. There are a variety of ways to do this depending on whether the information is stored in hard copy or electronically. An attorney should be consulted concerning the provisions of the Privacy Act that should be incorporated into this policy.</p>		
<p>Travel and Expense Reimbursement. If guidelines are set by the state for travel expense and cost reimbursement then written policies should be identified. Consult OMB circulars A-87 and A-122. A suggested policy is to allow the CAA or other grantee to use its current policy if it is a public agency, the current state policy or a policy approved by the state. In any event this directive should require the CAAs to have written travel and expense reimbursement policies.</p>		
<p>Purchase or Permanent Improvement of Real Property. Discuss timing and under what circumstances the CAA or other grantee may request a waiver for the use of CSBG funds to purchase or undertake permanent improvements to real property. Discuss processing time required as you will need to get federal OCS approval to grant the request. It's suggested that you allow about 45 days for the federal response and add that to your own internal processing time.</p>		

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<p>Personnel Policy. Establish expectations that the board of directors (non-profits only) develops and approve written personnel policies for the CAA. Review these policies not less than every 5 years and update them if needed. The requirement should specify that these policies should establish rates of compensation for each staff position and include other standard provisions such as equal employment, discipline, and grievance, job classifications, promotions, training and similar provisions. In the case of public agency CAAs, the CAA should be required to specify the personnel policies under which it operates and make those available to the state CSBG office upon request.</p>		
<p>Client Eligibility Verification. Establish the client income eligibility level to be used statewide and what income eligibility documentation the state will accept to verify household income. The eligibility level must be based upon the federal poverty income guidelines. Many states use 125% of the federal poverty line. Customer income eligibility should be updated yearly as the OMB poverty income levels are revised and released.</p>		
<p>Conflict of Interest: Establish an expectation that CAAs have a conflict of interest policy. This policy should cover staff, board members and volunteers. The policy should focus upon the prevention of self dealing where an individual takes advantage of their position within the organization to enrich themselves or gain other advantage.</p>		
<p>Political Activity. Establish an expectation that CAAs have a political activity policy that addresses partisan political activity and transporting voters to the polls. Consult Section 678F – (b) of the CSBG Act.</p>		

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COMMUNICATING POLICY AND PROCEDURE TO THE COMMUNITY ACTION AGENCIES AND OTHER CSBG GRANTEES	Describe Current Practice	Comments
<p>ROMA. Describe the ROMA requirements and identify the forms and reporting requirements the state has. State ROMA requirements should be based on the use of the National Indicators of Community Action Performance and the reporting format states are required to use on the CSBG/IS Part II.</p>		
<p>Fidelity Bonds and Insurance. Establish requirements for fidelity bonds and liability insurance. This should include fidelity bonding for all persons involved with handling funds and executing financial transactions. Liability insurance should include directors and officers' insurance, volunteer and special event insurance, employment practices liability, and general liability at a minimum. Some agencies may want to carry other types of insurance that are specific to programs and activities. If there are CAAs in your state who self insure, they should carry a policy to cover claims that exceed the funds set aside for such purposes. A general "rule of thumb" for health insurance is that self insurance pools (one or a group of agencies) usually must encompass about 1,000 employees before substantial savings from self insurance can be realized.</p>		

INTERNAL CONTROL AND ACCOUNTABILITY	Current Practice	Comments
<p>Progress Reports. These should be based upon objectives set in the CAAs' annual or multi-year work plans and describe the process leading to the achievement of ROMA outcomes.</p>		
<p>Outcome Reports. These reports should describe the ROMA based outcomes stated in the CAAs' annual or multi-year work plans. States will have varying requirements regarding how often the report should be submitted. These reports may be formatted so as to facilitate the preparation of a statewide outcomes report.</p>		

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INTERNAL CONTROL AND ACCOUNTABILITY	Current Practice	Comments
<p>Monitoring. Monitoring should be seen as part of a process to strengthen CAAs. Monitoring should verify compliance with contracts and “directives”, verify the validity of progress and outcome reports via review of source data. However in assessing the health of an agency, state monitors should look at more than compliance with program rules and regulations. The monitoring process should include a system to document and inform the CAA of findings and deficiencies and identify and provide for technical assistance to CAAs and other grantees. Site visits must be conducted at least once every three years at each CAA. Desk reviews may be conducted in between or in preparation for on site reviews. A monitoring format should include basic procedures and forms plus a means for resolving findings and noting significant achievements. Monitoring findings from other programs should be utilized in the review of CAAs and other grantees. (See NASCSP CSBG Monitoring Standards for additional details).</p>		
<p>Monitoring Findings: Written procedures are in place to resolve monitoring findings in a timely fashion. Generally this should be regarded as achieving a resolution agreement within 90 days of the monitoring being transmitted to the CAA or other grantee. Where a CAA or grantee is uncooperative in resolving a finding sanctions such as increased monitoring, special reporting, restrictions on invoicing, direct discussions with the board of directors or the withholding of funds are employed.</p>		
<p>Contractor responsibility checks. This is a check to make certain that the CAA or other CSBG grantee does not have unresolved audit findings, is not delinquent in paying state or local taxes and does not have other similar problems before a contract is executed. Some states such as Pennsylvania have fully automated electronic systems that do this.</p>		

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INTERNAL CONTROL AND ACCOUNTABILITY	Current Practice	Comments
<p>Financial Audits. Generally speaking these will fall under the Single Audit Act requirements. OMB Circular A-133 should be consulted. A written procedure to resolve findings and disallowed costs should be transmitted to the CAAs. Procedures should generally include achieving a resolution within 90 days of written notice to the grantee.</p>		

It is recommended that the federal Government Accountability Office (GAO) publications entitled “Standards for Internal Control in the Federal Government” GAO/AIMD-00-21.3.1 and “Executive Guide: Strategies to Manage Improper Payments: Learning from Public and Private Sector Organizations” GAO-02-69G be reviewed. OMB Circular A-123 should also be consulted. These documents, among other subjects, cover the following elements of internal control: creating a culture of accountability, assessing risks and their potential impacts, implementing oversight processes to insure that program objectives are met, using and sharing information stemming from oversight activities, tracking initiatives to improve programs and identifying steps to improve program efficiency and effectiveness. Basic accountability components used to implement these control elements include progress reporting, outcome reporting, on site monitoring, contractor responsibility checks and financial audits.

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ALLOCATION OF CSBG FUNDS	Current Practice	Comments
<p>Use of CSBG Funding. States must adhere to uses of CSBG funds established in the CSBG Act, not less than 90% of the funds made available to a state shall be used to make grants to eligible entities, the remainder can be used for statewide activities that may include training and technical assistance, coordination of services to low-income children and families, coordination and communication among eligible entities, support of asset-building programs, innovative programs, state charity tax credits and other activities consistent with the purposes of the CSBG Act. No state may spend more than the greater of \$55,000 or 5% of the grant received for administrative expenses, including monitoring activities.</p>		
<p>Public and Legislative Hearings. In accordance with CSBG Act requirements conduct a public hearing to provide to the public an opportunity for comment on the State CSBG Application and Plan and hold one legislative hearing every 3 years in conjunction with development of the State Plan.</p>		
<p>Periodic Review of Allocation Procedures. A formal written procedure for the statewide allocation of CSBG funds to the CAAs should be periodically reviewed by the state level CSBG advisory committee or similar group. This procedure or formula should be committed to writing and kept as a permanent record in the state office.</p>		
<p>Timely Distribution of Funding. States should develop methods for allocating funds and contracts to CAAs in a timely manner.</p>		
<p>Timely Payments. Request for payment or invoices from CAAs are processed in a fashion that is reliable and predictable so that CAAs and other grantees can plan program activities.</p>		

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Training and Technical Assistance	Current Practice	Comments
<p>Section 678C of the Community Services Block Grant legislation requires that states provide technical assistance to CAAs to help in the correction of deficiencies before undertaking a reduction or termination of funding. OMB Circulars A-102 and 1-110 also suggests technical assistance as a means of correcting deficiencies in high risk grantees or as part of an action to enforce regulations. A training and technical assistance capacity is key to resolving monitoring and audit findings. It is recommended that this capacity be an ongoing part of the management of your state's CSBG program and not be something that is undertaken only in a time of crisis. Some useful approaches to implement capacity building efforts, include the following:</p>		
<p>Use of state administrative and/or discretionary funds to inventory the skills of CAA staffs statewide and facilitate the provision of technical assistance on a peer to peer basis.</p>		
<p>Regular training of local CAA boards. Administrative and CSBG Discretionary Funds may be used for this.</p>		
<p>Training of selected state and CAA staff to serve as ROMA resource persons and trainers.</p>		
<p>Development of a cadre of consultants that can be tapped to assist CAAs in trouble or undertaking significant agency improvement initiatives.</p>		
<p>Annual statewide or regional training conferences hosted and/or supported by the state CSBG Offices.</p>		
<p>Scholarships for staff of small CAAs to attend statewide or national conferences.</p>		
<p>Support for state associations of CAAs that provide training, information and advocacy on behalf of CAAs.</p>		

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Training and Technical Assistance	Current Practice	Comments
Frequent informal meetings and discussions between the state CSBG manager and CAA executive directors, boards, state CAA association staff and local stakeholders.		

State Partnerships	Current Practice	Comments
Establish working relationships with other state agencies involved in complimentary activities. This can involve serving on interdepartmental advisory or work groups, participating in professional associations and involving staff from other state agencies in a CSBG advisory group. In order to meet CSBG Legislative requirements, states should especially establish linkages with other low-income and anti-poverty governmental and social service programs. Consult Section 676.(b) (5) and (6) of the CSBG Act.		

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SELF-ASSESSMENT TOOL FOR STATE CSBG MANAGERS: PART 2

INTRODUCTION: The Community Services Block Grant with its fixed network of Community Action Agencies and program decisions vested in local boards poses some unique challenges for the state level management. Part 2 of this self-assessment focuses upon those resources and practices that can assist the CSBG offices in addressing those challenges in a way that **goes beyond compliance with federal regulatory requirements**. The objective here is to provide suggestions that will assist the **user in achieving not just compliance with regulations, but excellence**.

Six key areas are covered: Staff Resources, State Level Advisory Committee, Leadership Resources, Communication Tools and Resources, Information Technology Resources and Creating a Culture of Accountability and Performance. A list of recommended readings is also provided.

This self-assessment is not designed to provide a rating or score but rather to serve as a means of identifying those key management resources that may be strong, need improvement or missing. In the space provided after each category enter “S” if this is an area of strength, enter “I” if this resource is present but improvement is needed and enter “M” if this resource is unavailable or not used. Upon completion those areas designated “M” should be your first priority for corrective action followed by those areas designated “I”.

STAFF RESOURCES	S=Strength I=Improvement Needed M=Missing	Comments
<p>Staffing Numbers. Sufficient number of staff to monitor all CAAs in the state adequately. Although federal requirements call for monitoring once every three years, such a long interval between site visits is generally not regarded as optimum for oversight and accountability. Many states currently monitor all of their CAAs once per year. The number, complexity and size of CAAs and the distances to be traveled for site visits vary greatly across the country. Further the duties of staff assigned to monitor CAAs differ widely from state to state. This makes a single standard for how many staff are needed to monitor in a given state a bit difficult. However, one approach that may be useful is as follows:</p>		

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STAFF RESOURCES	S=Strength I=Improvement Needed M=Missing	Comments
<ol style="list-style-type: none"> 1. Determine the average travel time to a CAA. 2. Estimate the average time needed to complete a monitoring site visit. 3. Determine the average time needed to prepare a monitoring report. 4. Estimate the average number of person hours devoted to resolving a monitoring finding and providing follow up or technical assistance related to monitoring. 5. Add all these person hours up and multiply by the number of CAAs in your state to determine the number of full time staff equivalents necessary to carry out the monitoring function. <p>Additional staff will of course be needed to carry out other CSBG administrative functions. However, these vary so widely among the states that no specific standard is attempted here.</p>		
<p>Staff Hiring. Staff are recruited and employed via a system that complies with OMB Circular A-87, Attachment B, Section 8. This provision of A-87 requires that for employee compensation to be reimbursable with federal funds it must “follow an appointment made in accordance with a government unit’s laws and rules and meet merit system or other requirements required by federal law, where applicable”.</p>		

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STAFF RESOURCES	S=Strength I=Improvement Needed M=Missing	Comments
<p>Staff Expertise. Staff working directly with CSBG should have expertise in the following key areas:</p> <ul style="list-style-type: none"> ▪ NASCSP Monitoring Standards or some equivalent set of policies and procedures. ▪ CSBG and state legislation and regulations. ▪ Basic non-profit board governance functions and board member roles and responsibilities. ▪ Knowledge of other common CAA programs outside of CSBG. These could include Head Start, Weatherization, TEFAP , HOME, and Workforce Investment Act. ▪ Results Oriented Management and Accountability (ROMA). ▪ History and Vision and Values of Community Action. ▪ Grantsmanship, grant writing, grant review and funding resources. ▪ State and IRS regulations concerning fundraising by non profits. ▪ State and federal regulations concerning lobbying and political activities by non-profits and local government agencies. ▪ Monitoring procedures established at the state level. ▪ Content of the state CSBG plan. ▪ Content of the state CSBG contract format. ▪ State CSBG processes and procedures related to contracts and reimbursement of costs. 		

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STAFF RESOURCES	S=Strength I=Improvement Needed M=Missing	Comments
<p>Staff Training. Staff working with CSBG should receive training and information on the areas identified above. CSBG staff should regularly attend local, state, regional and national conferences to stay current on issues related to CAAs and CSBG. Each non-clerical staff person should have opportunity to participate in local, statewide, regional and national activities including NASCSP, NCAF, CAP, CCAP and/or CAPLaw trainings. State administrative dollars may be budgeted for professional development opportunities such as these.</p>		
<p>Poverty. Basic facts and statistics regarding poverty in the state. For example, these would include such items as the number of low income households, the racial and ethnic make up of those households, where there are concentrations of poverty and the common causes of poverty in the state. (*For examples of such resources, please see http://www.census.gov/hhes/www/poverty/poverty.html and http://www.dataplace.org/)</p>		
<p>Fiscal Management. A basic understanding of the elements of internal fiscal controls and the budgeting process. Audits and procedures for resolving audit findings. Staff should be knowledgeable regarding applicable OMB Circulars.</p>		

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STATE LEVEL ADVISORY COMMITTEE	S=Strength I=Improvement Needed M=Missing	Comments
<p>Advisory Committee. An advisory committee should be formed that is composed of CAA staff, staff from other state or federal agencies, low-income persons and other stakeholders. Some states may select to use existing groups such as CAA directors association. Minimally this group reviews CSBG operations, proposed “directives”, makes recommendations for the CSBG State Plan and reviews and signs off on the final Plan to be submitted to OCS.</p>		

LEADERSHIP RESOURCES	S=Strength I=Improvement Needed M=Missing	Comments
<p>These are assets and practices used primarily by the senior managers of the state CSBG office. Leadership is difficult to define but the following assets and practices are characteristic of effective CSBG managers:</p>		
<p>Action Oriented. All bureaucratic systems no matter how well designed get “stuck” from time to time. This may be due to heavy workloads, human error or other factors. Effective managers actively seek out problems and facilitate solutions. These solutions may arise from formal procedures that the manager has established or from informal relationships he/she has worked out with other staff and managers in the bureaucracy. The end result is a capacity to respond to the unexpected effectively and efficiently.</p>		

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LEADERSHIP RESOURCES	S=Strength I=Improvement Needed M=Missing	Comments
<p>Communicate Effectively. Largely this means an ability to frame both problems and solutions in such a way as to gain support from superiors. Conveying information, policy changes and soliciting feedback with staff members internally is important. Effective communication also includes an ability to speak well before groups outside the agency and to explain the work of CAAs effectively to the public.</p>		
<p>CSBG Discretionary Funds are Used to Build the Capacity of the CAA network. This involves the use of CAA funds to leverage other local, state and federal funds, to train CAA staff and board members, to provide technical assistance to CAAs and provide incentives to CAAs to address state priorities.</p>		
<p>Establish Goals. regularly set outcome goals and communicate these goals to staff and to the CAAs where appropriate.</p>		
<p>Well Informed. Work at staying well informed and keeping staff well informed. Visiting key websites such as NASCSP, NCAF, CAP, CAPLAW, OCS and ROMA1.org and reading either the New York Times or the Washington Post and the largest paper in their state on a regular basis is often a habit of effective managers.</p>		
<p>Experience. Community Action is complex and multi-disciplinary. Consequently it has a long learning curve. The most effective managers often have a great deal of experience in the field</p>		

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COMMUNICATION TOOLS AND RESOURCES	S=Strength I=Improvement Needed M=Missing	Comments
Information should move promptly within the state office and where appropriate out to the CAA network. This encompasses both informal and formal communication – that is discussion and consultation (informal) and transmission of policy, procedure and decisions (formal). Systems should be in place to facilitate and support communication. These systems should include:		
Communication. A variety of methods should be used to keep state office staff informed and updated. Regular meetings of state office staff should be held. If the state office has field offices where monitors or other staff are stationed, these staff should be conferenced by phone not less than monthly and brought into the central office for face to face discussions three to four times per year. Forwarding list serve information and other communications via email is helpful.		
Partnerships and Networks. Senior state managers should develop formal and informal discussion networks with CAAs and with managers of other state and federal programs to identify problems, prevent duplication and develop ways to improve program coordination. (See Part II Leadership Resources)		
State Memorandums/Directives. A system of signed, dated and numbered policy memorandums, directives, policy manuals that are issued as needed to transmit policy and procedure to CAAs and other grantee agencies.(See Part 1)		
Conferences. Regular statewide or regional (multi-state) training conferences. Generally these are held annually. All CAA and state staff should attend.(See Part II Staff Resources)		

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INFORMATION TECHNOLOGY RESOURCES	S=Strength I=Improvement Needed M=Missing	Comments
Hardware. All state staff is equipped with computers and internet access.		
Software. All state staff are trained and re-trained as necessary on the use of software used in the state office and commonly used among the CAAs.		
Electronic Reporting. Written minimum standards for computers and software have been issued to the CAAs to facilitate electronic program and fiscal reporting.		
Electronic Reporting. CAAs are able to complete and submit required reports to the state office electronically.		
Support for Use of Technology. CAA use of computers and electronic information technology is strongly encouraged by the state office and supported with special grants if necessary and technical assistance		

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CREATING A CULTURE OF ACCOUNTABILITY AND PERFORMANCE	S=Strength I=Improvement Needed M=Missing	Comments
In a real sense all of that shown above helps to create a culture of accountability and performance. Some additional steps that add to the development of such a culture are:		
Recognition. An awards program that publicly recognizes outstanding performance and achievement.		
Communication. Informal meetings between senior state staff and local CAA staff where problems and expectations are discussed.		
Training and Technical Assistance. An on going and well funded training and technical assistance effort to build the capacity of CAAs. This should include support for peer to peer technical assistance between CAAs and well as formal training and the use of consultants.		
Experienced and Trained Staff. A well trained and well informed state staff. See Part II Staff Resources, Staff Expertise.		
Best Practices Dissemination. Creating opportunities for peer networking and the sharing of best practices at conferences and meetings with CAAs.		
Feedback from CAAs. Regularly soliciting input from CAAs and other grantees concerning training and technical assistance needs and responding promptly to those needs.		
Speedy Resolution of Problems. Promptly and decisively resolving monitoring and audit findings. Technical assistance should be the first response, except where criminal behavior may be involved. Technical assistance should be followed by sanctions where necessary.		

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RECOMMENDED READING:

The Certified Community Action Professional (CCAP) Body of Knowledge
<http://www.communityactionpartnership.com/ccap/default.asp>

Managing the Non-Profit Organization, Principles and Practices. Peter F. Drucker,

Rules for Radicals, Saul D. Alinsky. Read chapter entitled “In the Beginning”

The Revolt of the Elites”, Christopher Lasch. Read part 1 entitled “The Intensification of Social Divisions”

The End of Equality. Mickey Kaus Read chapters 3 and 4.

Democracy’s Discontent. Michael Sandel. Read “Conclusion: In Search of a Public Philosophy.”

The Wealth and Poverty of Nations. David S. Landes. Read chapter 29 “How Did We Get Here? Where Are We Going”.

Banishing Bureaucracy. David Osborne and Peter Plastrik. Read Chapter 8 “The Culture Strategy”.

The Politics of Rich and Poor. Kevin Phillips.

To Empower People. Peter L. Berger and Richard John Neuhaus.

"See Poverty, Be the Difference", Dr. Donna Beegle
<http://www.combarriers.com/>

Bridges Out of Poverty: Strategies for Professionals and Communities. Ruby K. Payne, Philip Devol, Terie Dreussi Smith