



Mastering the A-B-CSBGs

Mechanics of CSBG

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Agenda



- **History of CSBG**
- **State Responsibilities**
 - Allocation of CSBG Funding
 - State Plans
 - Designation of New Eligible Entities
- **CAA Responsibilities**
 - Community Needs Assessment
 - Community Action Plan
- **Shared Responsibilities**
 - Annual Report

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Community Action Beginnings

President Lyndon B. Johnson's War on Poverty



- **Economic Opportunity Act of 1964**

- Community Action is born
- Established over 1,000 CAAs
- Also created Job Corps, VISTA



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Community Action Beginnings

Office of Economic Opportunity



- **Office of Economic Opportunity (OEO) formed to lead War on Poverty**

- Laboratory to incubate other programs (Head Start, Legal Services Program, Comprehensive Health Services Program)



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Community Action Beginnings

Maximum Feasible Participation



- Mandated **maximum feasible participation** of residents of the area served
 - CAAs must involve community served in decision-making
- **1966 Quie Amendment**
 - At least 1/3 of CAA board members represent the poor
 - Tension with big city mayors, who were concerned this would undermine power of the local government

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Community Action Beginnings

Additional Restrictions



- **1967 Green Amendment**
 - Established that CAA boards have three-part structure:
 - Public officials + democratically selected individuals of low-income community + representatives of other groups
- **During this Time**
 - EOA amended to add restrictions on political activities of CAA and their employees
 - Response to CAA voter registration and advocacy activities
- **1973-1975 Battles at OEO**
 - OEO Director told not to spend CAP funds + close agency
 - 1975 amendment dismantled OEO and created Community Services Administration (CSA)

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Community Action Beginnings

Funding Shifts



1981: Ronald Reagan elected president

- Economic Opportunity Act repealed
- Congress combined 57 discretionary grants into 9 block grants
- Community Action grant repealed and replaced by the **Community Services Block Grant** (42 U.S.C. 9901 *et seq.*)
- Federal **Community Services Administration** (CSA) closed and functions transferred to **Office of Community Services** (OCS) within the U.S. Department of Health and Human Services (HHS)

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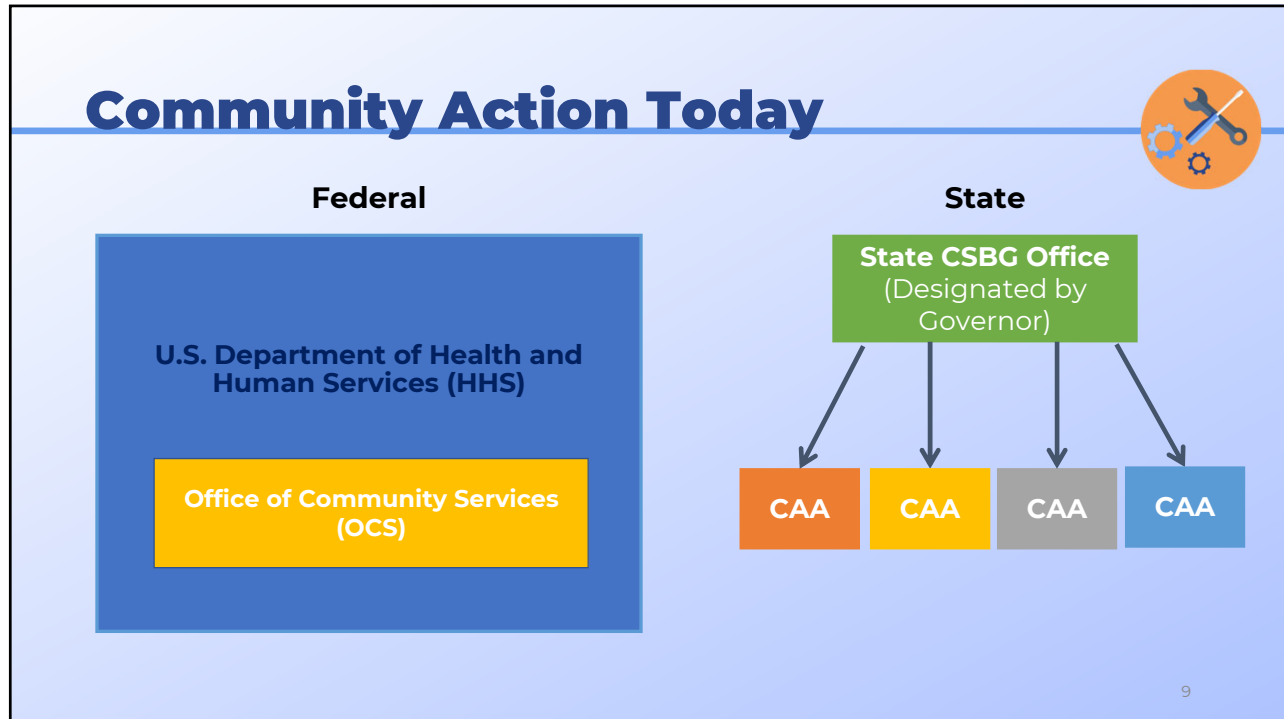
Community Action Today



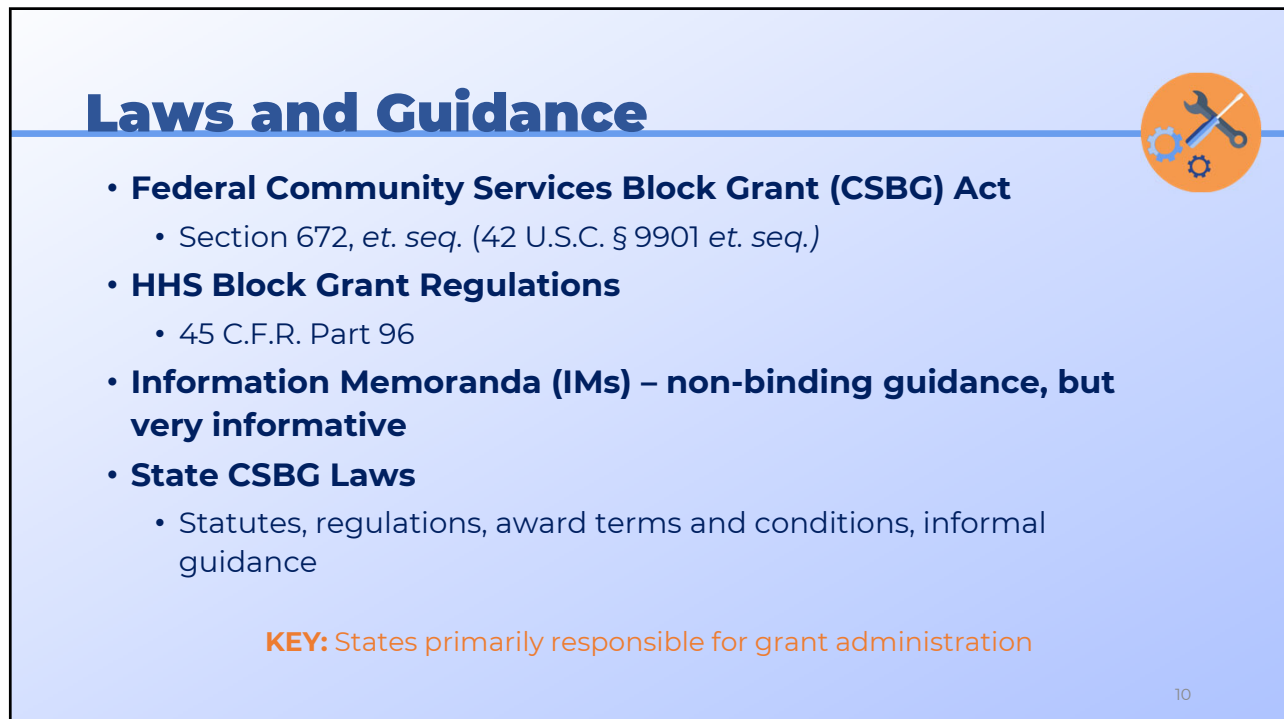
- Approximately **1,000** CAAs today
 - 80% are nonprofit organizations
 - Remainder are local government entities (public CAAs)
 - Referred to as "eligible entities" in federal CSBG Act
- **Importance of CSBG funds to CAAs**
 - Gives CAAs their identity as a CAA
 - Flexible use: support, enhance, and link CAA's other poverty alleviation programs
 - Impacts board governance of CAA

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Allocation of CSBG Funding



- **“90% funds”**
 - State **must** pass through 90% of CSBG funds to “eligible entities”
- **“10% funds”**
 - Up to 5% for state’s own administrative costs
 - States limited in how they spend funds not passed to CAAs

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Allocation of CSBG Funding



- **How States Use 10% Discretionary Funds:**
 - Provide training and technical assistance (T/TA)
 - Does not count towards 5% administrative limit
 - Provide funding support to the state association for T/TA
 - Support statewide programs and initiatives
 - Support innovative programs that CAAs or other community organizations operate
 - Increase the 90% CSBG funding allocations to individual CAAs
- **Support other activities consistent with the purposes of the CSBG Act**

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State Responsibilities

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State CSBG Office

Sec. 676 of the CSBG Act



- **Designated State “Lead Agency”**
 - Receives state’s CSBG funding allocation
 - Develops state plan to submit to HHS
 - Holds public hearing on state plan
 - Hold one legislative hearing every 3 years in conjunction with development of state plan
 - Monitors eligible entities

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State Plan

Sec. 676 of the CSBG Act



- **Application and Plan**
 - States must submit application and plan to HHS to receive CSBG funding
 - Can include 1 or 2 federal fiscal years
 - Due no later than 30 days prior to beginning of fiscal year
 - Application must include the “state assurances” described in the CSBG Act
- **Public Inspection and Hearing**
 - State must hold at least one public hearing, with sufficient time and statewide distribution of notice of such hearing, to give an opportunity for comment on the proposed use and distribution of funds.

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State Plan

Sec. 676 of the CSBG Act



- **Revisions**
 - A state can revise the state plan so long as:
 - The revised plan is made available for public inspection, review, and comment
 - The revised plan is submitted to HHS for review and approval

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State Plan

Sec. 676 of the CSBG Act



- **State Assurances:** State plan must make certain assurances, including:
 - Using CSBG funds to further **goals and purposes** of Act by helping individuals and families with low-incomes:
 - Remove obstacles and solve problems blocking self-sufficiency
 - Secure and retain meaningful employment
 - Attain education
 - Develop financial planning skills
 - Secure housing
 - Obtain energy assistance
 - Increase participation in community affairs, especially those affecting them
 - Address needs of youth

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State Plan

Sec. 676 of the CSBG Act



- **State Assurances:** State plan must make certain assurances, including:
 - Describing state's use of **10% discretionary** funding;
 - Obtaining information from CAAs
 - **Community action plans** that includes the community needs assessment
 - Description of service delivery systems, linkages to fill gaps in services (e.g., referrals), coordination with public and private resources, and innovative community and neighborhood-based initiatives

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State Plan

Sec. 676 of the CSBG Act



- **State Assurances:** State plan must make certain assurances, including:
 - **Providing** emergency services when needed
 - **Coordinating** and **establishing linkages** between governmental and social services programs to assure effective delivery of services and avoid duplication
 - **Coordinating** and **forming partnerships**, to the extent possible, with other anti-poverty and community programs

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State Plan

Sec. 676 of the CSBG Act



- **State Assurances:** State plan must make certain assurances, including:
 - Not **terminating or reducing** the CSBG funding of a CAA below the proportional share it received the previous year **without following certain procedures**
 - Ensuring the state's and CAAs' participation in the **Results Oriented Management and Accountability (ROMA)** system
 - Ensuring CAAs will establish procedures to permit low-income individuals and groups to **petition for representation** to the board

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Designation of New CAAs

Sec. 676A of the CSBG Act, IM 116



- State may designate a new CAA if an area is not served, or ceases to be served
- No required designation process in Federal CSBG Act
 - State may solicit applications
- When designating new CAA:
 - Preference given to nonprofits
 - Existing CAAs may be given priority

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Designation of New CAAs

Sec. 676A of the CSBG Act



Nonprofit Option #1

Geographically located
in the unserved area

Capable of providing a broad range of services designed to eliminate poverty + foster self-sufficiency

Meet the requirements of the CSBG Act (such as the tripartite board requirement)

Nonprofit CAA Option #2

Geographically located in an area **contiguous to** or **within reasonable proximity** of the unserved area

Already providing related services in the unserved area

Agree to add members to ensure compliance with CSBG Act's tripartite board requirement

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Designation of New CAAs

Sec. 676A of the CSBG Act



- **Choosing a New Public CAA**

- State can designate a political subdivision to serve as a CAA only if **no nonprofit organization** is identified or qualified

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Designation of New CAAs

Sec. 676 of the Act; 45 C.F.R. 96.50; IM 116



- **Timeline for Designation**

- State can begin soliciting applications for new CAA:
 - After a notice and hearing on the record has occurred with respect to a statewide redistribution of funds; OR
 - After it makes a final decision to terminate an existing CAA's CSBG funding for cause, and CAA has appealed the decision to OCS
- But state **cannot award CSBG funds to new CAA** until OCS confirms the state's decision to terminate (or the review period ends)

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CAA Responsibilities

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Community Needs Assessment

Sec. 676 of the CSBG Act



- Stems from state assurance
 - “the State will secure from each eligible entity in the State...a community action plan...that includes a **community-needs assessment** for the community served” (Sec. 676(b)(11))
- Aligns with overall purposes and goals of CSBG
 - For CSBG to be used in a manner **responsive to local needs and conditions**
- Connects to tripartite board structure
 - To allow maximum feasible participation by the consumer sector to respond to the **unique problems and needs within their communities**

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Community Needs Assessment

IM 138: CSBG Organizational Standards



• Elements of a CNA

- Conducted + report issued within the past 3 years (**Std. 3.1**)
- Reports current data specific to poverty and prevalence related to gender, age, and race/ethnicity in CAA's service area (**Std. 3.2**)
- Analyzes both qualitative and quantitative data in CAA's service area (**Std. 3.3**)
- Includes key findings on the causes and conditions of poverty and the needs of the community (**Std. 3.4**)
- Formally accepted by the governing body (**Std. 3.5**)

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Community Needs Assessment

Sec. 676 of the CSBG Act




- Key points to note:
 - CAA's programs and services are determined by **community needs assessment**, not by the state
 - The CNA for CSBG can be coordinated with community-needs assessments conducted for **other programs**
 - CSBG funds can pay for community-wide needs assessments that inform CSBG as well as CAA's other programs/services (IM #37)

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Community Needs Assessment

NCAP Resources



Community Needs Assessment Tool

by | Mar 16, 2022 | Community Needs Assessment, Management & Operations



[Click Here to Access](#)

This Hub acts as your entry into an online tool with multiple features that allow for the efficient use of data and mapping as part of a larger Community Needs Assessment process. Here, you can measure and visually represent the fundamental drivers of poverty in your community through an array of census data sets, a report generator, and a mapping tool. The Comprehensive Community Needs Assessment tool allows you to:

- Select state(s) and county(ies) to be included in your report (i.e. Indiana, Porter County, New York, Albany County, Rensselaer County, Schenectady County);
- Select specific data elements (Demographics, Employment, Education, Housing, Income, Nutrition, and Health Care);
- Preview a draft report

Resource Library

Discover Innovative Community Action Initiatives at Community Action Showcase!

The Center of Excellence is a national training hub, engaging Community Action Agencies coast-to-coast to share innovative, high impact strategies. This platform shines a light on Community Action success stories to inspire. Here you can access resources to strengthen services, build community outcomes, and create family and community change in your local area.

Community Needs Assessment Tool

This Hub acts as your entry into an online tool with multiple features that allow for the efficient use of data and mapping as part of a larger Community Needs Assessment process. Here, you can measure and visually represent the fundamental drivers of poverty in your community through an array of census data sets, a report generator, and a mapping tool.

Leveraging Partnerships in COVID-19 Response & Recovery

This brief highlights practices that local CAAs can engage in to establish new partnerships or collaborative relationships and describes some of the learnings from Capstone Community Action as they convened resources to assist families in crisis.

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Resource Type


Any

Topics

- Management & Operations
- Community Needs Assessment
- Organizational Standards
- Community Engagement
- Human Resources
- Innovative Practices
- Community Level Work
- Data Centered Organizations
- Whole Family Approaches
- Leadership

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Community Action Plan



- Each CAA must develop a **Community Action Plan** that includes a **community needs assessment** (Sec. 676(b)(11) of the CSBG Act)
- **Elements of a CAP:**
 - Outcome-based, anti-poverty focused, and ties directly to CNA (Std. 4.2)
 - Documents the use of the Results Oriented Management and Accountability (ROMA) cycle (Std. 4.3)
 - Board receives an annual update on the success of the strategies outlined in the CAP (Std. 4.4)

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Shared Responsibilities

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Annual Report

Sec. 678E of the CSBG Act



- Each year, states must prepare and submit to OCS an **annual report** on the activities and performance of the state and its eligible entities
 - Includes information that the state collects from CAAs, such as:
 - CSBG funds spent on direct program vs. administrative costs
 - Information on clients served
 - State must also describe activities, such as:
 - Monitoring schedule
 - Linkages and coordination at the state, local, and eligible entity levels
 - Coordination among eligible entities and state association
 - Summary of T/TA offered

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239 Resources
60 Topics
20 Types

Including:


Articles
 Legal Updates
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 Webinars
 Videos
 Training Modules
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 Podcast *(new!)*

Visit CAPLAW's Resource Library!




Community Economic Development for CAAs

As part of their mission to lift people with low incomes from poverty to self-sufficiency, Community Action Agencies (CAAs) often seek to spur growth and build wealth in their communities through job creation and business development. These efforts can generally be referred to as "community...



Mastering the A-B-CSBGs: Tripartite Board Selection and Composition

Maintaining a tripartite board is challenging enough without questions about who can serve and how to elect them. In this session, we reviewed the rules and guidance applicable to the public, private, and consumer sectors. This session is part of CAPLAW's Mastering the A-B-CSBGs series, which...



Election Year Refreshers for Nonprofit and Public CAAs

Keeping track of the rules relating to election and campaign activity for both nonprofit and public Community Action Agencies (CAAs) is never easy! As the election season enters its final stretch, read CAPLAW's updated Election Year Refreshers for a quick review of some of the most...

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