

Preserving the Low-Income Voice

Snapshots of Democratic Selection Procedures in a Pandemic



INTRODUCTION

The COVID-19 pandemic has created a multitude of unprecedented challenges for Community Action Agencies (CAAs). From scaling up and adapting existing programs, to navigating new laws and administrative dilemmas, CAAs have stepped up to meet those challenges and develop new procedures enabling them to better serve their clients.

One of the challenges that has spurred CAAs to innovate is the need to recruit and elect representatives of the low-income community to serve on the tripartite board. Under the Community Services Block Grant (CSBG) Act, for a nonprofit or public CAA to receive CSBG funding, at least one-third of its board must be chosen in accordance with democratic selection procedures adequate to ensure that they are representative of the low-income individuals and families in the neighborhood served by the CAA ([42 USC § 9910\(a\), \(b\)](#)). This requirement is unique to Community Action and serves as a hallmark of the program's commitment to providing low-income people with a voice in the development, planning, implementation, and evaluation of anti-poverty programs.

While it imposes the tripartite requirement, the federal CSBG Act does not offer any guidance on how to conduct a democratic selection procedure; for that, CAAs can look to [CSBG Information Memorandum \(IM\) 82](#) from the Office of Community Services. IM 82 states:

Every effort should be made by eligible entities to assure that board members representing low-income individuals and families have been selected on the basis of some form of democratic procedure either directly through election, public forum, or, if not possible, through a similar democratic process such as election to a position of responsibility in another significant service or community organization such as a school PTA, a faith-based organization leadership group; or an advisory board/governing council to another low-income service provider.

CAPLAW has termed the latter method a “micro election”, and many CAAs have used this type of procedure by asking another group that is representative or comprised primarily of low-income individuals to elect someone from their group to sit on the CAA's tripartite board. It is not enough for the electing entity to serve the low-income population; it should itself be primarily made up of low-income individuals. This reflects the purpose of having a tripartite board in the first place: to establish a mechanism for gathering and empowering the feedback of the community served, along with the public and private sectors.

Micro elections are just one of the various ways a CAA may conduct recruitment and elections for the low-income representative sector of its board. Each CAA and service area are unique, but all have been tested in some way during the COVID-19 pandemic. Roughly half of 150 CAA respondents to a recent survey said that they changed some aspect of their existing procedures for low-income sector board recruitment or elections in response to the pandemic. Many revealed that the changes resulted in a more effective, streamlined process that enabled additional community members to participate. While serious obstacles to client engagement still existed, such as lack of internet access, transportation, and childcare, on top of state and local restrictions on gatherings and service delivery, CAAs adapted. Even amidst the difficulties, many agencies successfully recruited and elected new low-income sector representatives to their board. Their experiences and outcomes can assist other CAAs with tripartite board compliance through the remainder of the pandemic and beyond.

CAPLAW has compiled the following brief “snapshots” of changes CAAs have made and existing practices that have served them well during the pandemic. Some CAAs undertook a complete overhaul of their recruitment and election procedures, while others tested out new ways of conducting one piece of the process. Still others found that they didn’t need to make any major changes to their procedures, since they were already suitable for a socially-distanced environment. This resource briefly describes some of these CAAs’ experiences.

For another look at successful low-income sector recruitment and election procedures, check out CAPLAW’s [Raising the Low-Income Voice](#) case studies. The case studies, which discuss the logistics of low-income sector recruitment and elections at CAAs in different parts of the country, have been updated in connection with this resource to reflect how the profiled agencies adapted due to COVID-19. In their appendices, the case studies also include copies of relevant sections of the bylaws, policies, or other documents related to low-income sector selection. While the agencies profiled in the snapshots and the case studies are private nonprofits, these materials are also useful to public CAAs, since they too must maintain a tripartite board composed of at least one-third democratically selected representatives, unless their state has specified an alternative mechanism ([42 USC § 9910\(b\)](#)).

Though the practices described in this resource and the Raising the Low-Income Voice case studies may not be appropriate for every agency, we hope they will inspire CAA leaders to be thoughtful and creative in their implementation of democratic selection procedures. Making a change in this area may not seem convenient for an agency with longstanding governance practices, but it can pay off down the line. This is especially true as we move into a post-pandemic, technologically advanced world in which remote work and meetings are more accepted and utilized.

NEW RIVER COMMUNITY ACTION (NRCA)

Postcard Recruitment

Radford, Virginia (Rural)
15 board seats, 5 low-income representatives
Executive Director: Terry Smusz

As COVID-19 cases were first peaking across the United States in the spring of 2020, NRCA was starting to recruit candidates for three open seats in the low-income representative sector of its tripartite board. Fortunately, the agency was already utilizing a remote-friendly recruitment mechanism: postcards.

NRCA started using postcards for recruitment in 2016 after determining that individual recruitment of community members was not producing enough candidates for board service. The agency mails out postcards to all clients within the service area, but they are not addressed by name. Executive Assistant Sheila West says that is because NRCA’s service population is largely made up of renters who move around frequently; addressing the mailing without a name can encompass anyone who is currently occupying the recipient unit. Each NRCA postcard contains a brief description of the agency’s work as well as contact information for interested parties. Once someone gets in touch, NRCA mails them a packet of information about the board and CAA, including the bylaws and meeting requirements. The board also sets up a phone interview or in-person meeting (an outdoor, socially-distanced meeting during the pandemic) that allows them to get to know the candidate and further clarify what is expected of tripartite board members.

Once the list of candidates is finalized, NRCA puts together a ballot and publicizes the upcoming election in the local newspaper, on social media, and through program staff in each county within the service area. Elections for each county’s board seat are conducted on different days at the local office. Usually, clients can cast their ballots in the lobby, but during the pandemic, a table was set up



NRCA's Recruitment Postcard

outside the entrance to each site containing a pile of paper ballots and a jar of pens for voters to use to cast their ballot and then take home. NRCA's bylaws also require that elections for the low-income sector of the board be supervised by a monitor. In an inspiring example of pandemic-induced ingenuity, and despite her own recent exposure to COVID-19, Sheila monitored the elections by parking her car near the voting table and answering questions from voters through her (closed) driver's side window.

Though the 2020 elections for the low-income sector of NRCA's board didn't see a dramatic increase in voter turnout, the board and staff are proud of how they were able to keep the participatory spirit of Community Action alive under the dire circumstances of the pandemic. The agency's new board members are excited to join the team, especially after having the opportunity to meet in person with NRCA's CEO for a socially-distanced, one-on-one orientation session at their local NRCA office.

CAPITAL AREA COMMUNITY SERVICES, INC. (CACS)

Drive-thru Engagement

Lansing, Michigan (Urban)
 27 board seats, 9 low-income representatives
 Executive Director: Miguel Rodriguez

One would think that in the midst of a global pandemic, CAA staff would struggle to bring a personal touch to the low-income sector representative recruitment process. But that wasn't the case for the staff at CACS's Lansing/East Lansing Service Center in the fall of 2020. In fact, the process of filling two board seats in the low-income representative sector under quarantine and social distancing restrictions helped the staff to feel hopeful and connected to their clients during an especially challenging time.

CACS's service area, which is made up of four counties around the city of Lansing, is served by five different Service Centers. Each Service Center has an Advisory Council made up of staff and

community members who meet every month. The Advisory Councils support the agency by providing input on the annual Walk for Warmth project, assisting in the distribution of commodities and food, reviewing customer satisfaction surveys, and distributing and collecting client surveys for the community needs assessment. The Advisory Councils add an additional layer of community engagement beyond the tripartite board to assist the CAA in making decisions that will benefit the broadest cross-section of stakeholders. They also serve as a pipeline for tripartite board service.

In the past, CACS has conducted recruitment for open low-income sector board seats by sending out mailings to clients and encouraging staff to discuss the position while providing services. During the pandemic, however, the agency had to adjust its service delivery to reduce the amount of physical contact between staff and clients in order to keep everyone safe. One of the adjustments it made was to run its commodity food program on a reduced schedule and operate it as a drive-thru. Under the new arrangement, commodity food distributions were the times when the largest number of clients were present at the Service Center, so the staff decided to conduct their board recruitment then. Throughout every commodity food distribution in the month of September, staff walked up and down the line of cars outside the Service Center and handed out flyers containing information about the low-income sector election and the tripartite board. They took down the names and emails of people who were interested and sent them an application form containing details for the upcoming election. The form was also made available on CACS's website.

In past years, CACS's low-income sector election has taken place at a meeting in the large room where the board conducts its business. Due to public health concerns, CACS decided to hold its election outside in the parking lot of the Service Center, where Advisory Council meetings were also being held during the pandemic. On the day of the election, individuals interested in taking part arrived, presented their ID to demonstrate they were a resident of the service area, and sat six feet apart as each candidate gave a brief statement about why they wanted to serve on the tripartite board. Then, a vote was taken of those in attendance to determine which candidate would serve. Stability Services Director Pam Elise says that while the number of candidates standing for election was roughly the same as usual, voter turnout increased. She and the other Service Center staff were thrilled to see faces from the drive-thru line showing up to participate. Even from six feet apart, they felt closer than ever to the promise of governance by the community.



**COMMUNITY INVOLVEMENT & SUPPORT OPPORTUNITY
2020 - 2022**

**Capital Area Community Services, Inc.
Seeking Low-Income Consumer/Community
Representatives to Serve on Agency Board of Directors**

If you are interested in serving on the CACS Board of Directors – or learning more about what this opportunity involves, please call the identified Contact Person for your community:

County/Center	Address*	Contact Person	Phone #	Date/Time of Election*
Clinton County	1001 S. Oakland St. St. Johns, MI 48879	Pauline Baert	(989) 224-6702	September 17, 2020 2:00 PM
Eaton County	1370 N. Clinton Trail, Charlotte, MI 48813	Jeff Keener	(517) 543-5465	September 24, 2020 1:00 PM
Lansing/East Lansing	1301 Rensen St. Lansing, MI 48910	Jamie O'Dell	(517) 393-7077	September 16, 2020 5:30 PM
Rural Ingham County	218 E. Maple St. Mason, MI 48854	Marina Poroshin	(517) 676-1065	Call for Details
Shiawassee County	1845 Corunna Ave. Owosso, MI 48867	Becky Zemla	(989) 723-3115	Call for Details

*Elections will be held at the corresponding Service Center location listed above and/or held electronically.

- Eligibility:** 1) Reside in the CACS service area you wish to represent.
2) Be eligible to receive a service from CACS.

A **Candidate Registration Form** (copy attached) must be completed and returned to the appropriate Service Center location **at least one week prior to the date/time of the election.**

You will be contacted and provided with the election process information and guidelines.

PLEASE NOTE: If you are not interested in becoming a member of CACS's Board of Directors but are interested in supporting CACS in some capacity, please speak with the Contact Person listed. Several opportunities exist, including becoming a member of the Advisory Committee for your community. Each Advisory Committee works with their elected Consumer Representative to ensure the CACS Board of Directors is kept up-to-date on the needs in each community.

Additional information is available at each of the Service Center locations, as well as at the Administrative Offices located at 101 E. Willow Street, Lansing, MI 48906, (517) 482-6281.

CACS's Flyer for Recruiting Tripartite Board Candidates

GREAT LAKES COMMUNITY ACTION PARTNERSHIP (GLCAP)

Nominations and Voting via Online Survey

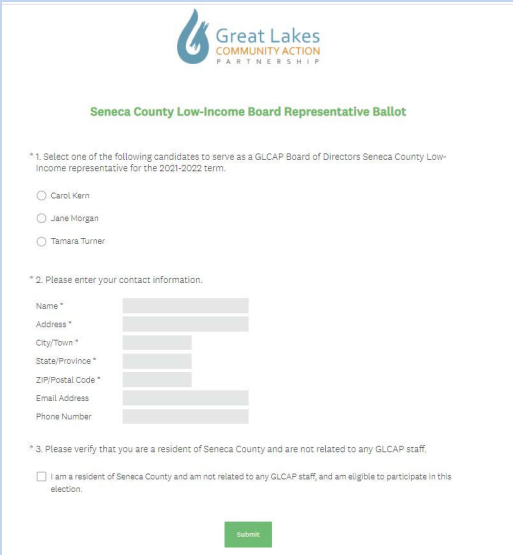
Fremont, Ohio (Suburban)
24 board seats, 8 low-income representatives
President/CEO: Ruthann House

When it came time to elect representatives to four open low-income sector seats in the fall of 2020, GLCAP CEO Ruthann House was concerned about client engagement. Before the pandemic, GLCAP held an annual, public meeting in each of its four counties to elect members to the low-income sector of its tripartite board. The meetings were usually held in conjunction with a Head Start parent meeting, and they included a free dinner to increase attendance. GLCAP usually encouraged proactive community members to attend the meeting and stand for election. However, even though the entire service area was invited, each gathering typically attracted 10 voters at best.

In response to the pandemic and restrictions on in-person gatherings in Ohio, Ruthann and her team came up with an entirely remote recruitment and election process. They limited the timeline of the process to two weeks to preserve its momentum and keep staff and potential candidates from losing interest. Ahead of the two-week period, GLCAP informed its current low-income sector board members that there would be a small window in which current members would have to nominate themselves to be considered. The agency also posted information about the position and election procedures on its website and social media account and used its Head Start contact list to reach out to families via text message.

The process started with a three-day self-nomination period. GLCAP posted a link on its website to a self-nomination form created using Microsoft Forms. Ruthann and her public relations director monitored the site for technical difficulties and kept an eye on the nominations as they rolled in. Two days after the end of the nomination period, a Friday, GLCAP announced the list of nominees and election procedures on its website. Voting would begin the following Monday and would be conducted over three days using a survey from SurveyMonkey. The survey required that the voter enter their name, address, and make two certifications: (1) that they were a resident of the county represented by the board seat, and (2) that they were not related to any GLCAP staff. The first certification ensured that the nominee selected would be truly representative of those residing in the service area, on whose behalf they were expected to serve, and the second addressed GLCAP's concerns about preventing conflicts of interest.

Over the three-day voting period, GLCAP collected a whopping 64 votes, easily dwarfing the number of votes that were usually cast at their in-person elections. Ruthann was pleasantly surprised that the process her CAA had put together as a temporary fix for an unusual year



The image shows a screenshot of a SurveyMonkey ballot for the Seneca County Low-Income Board Representative. At the top, it features the Great Lakes Community Action Partnership logo. The title of the ballot is "Seneca County Low-Income Board Representative Ballot". The form contains three sections: 1. A question asking to select one of three candidates: Carol Kern, Jane Morgan, or Tamara Turner. 2. A section for contact information with fields for Name, Address, City/Town, State/Province, ZIP/Postal Code, Email Address, and Phone Number. 3. A verification question asking to confirm the voter is a resident of Seneca County and not related to any GLCAP staff, with a checkbox for "I am a resident of Seneca County and am not related to any GLCAP staff, and am eligible to participate in this election." A green "Submit" button is located at the bottom right of the form.

GLCAP's SurveyMonkey Ballot for Seneca County

turned out to be a catalyst for community participation. Not only had GLCAP filled board seats using democratic selection in the midst of a global pandemic, but it had increased the visibility, and therefore accountability, of its board while doing so.

LINCOLN HILLS DEVELOPMENT CORPORATION (LHDC)

Mail-in Voting

Tell City, Indiana (Rural)
18 board seats, 9 low-income representatives
CEO: Randy Dennison

The pandemic may have changed the day-to-day operations of CAAs across the country, but luckily for LHDC CEO Randy Dennison, it didn't change much about his CAA's democratic selection procedures. LHDC regularly employs a mail-in balloting system throughout the rural counties that make up its service area, where there are significant barriers to reliable broadband internet service. The agency's commitment to utilizing the infrastructure most accessible to its clients—in this case, the United States Postal Service, paid off in 2020 by facilitating a smooth democratic selection procedure during a time of crisis.

When a vacancy occurs in the low-income sector of LHDC's board, the agency prepares a detailed election packet to mail out to parents in the CAA's largest program, Head Start Birth to Five. Randy says that Policy Council activities and the frequency of the Head Start parents' contact with the CAA contribute to this group being the most engaged group of clients. The election packet includes a letter describing the tripartite board structure and election process. It also contains a short biography of any qualified community member who has reached out to LHDC expressing their desire to stand for board service. Finally, the packet includes a pre-addressed postcard ballot allowing the recipient to vote yes or no on the pre-identified candidates, or to write in their own choice for the seat.



In addition to mail-in balloting, LHDC normally holds a public meeting at the end of the voting period for the purpose of accepting any additional nominations, providing an in-person voting option, and tallying the votes. The meeting is announced in the local newspaper and is open to the public, but a sign-in sheet is used to certify that those seeking to vote are low-income and not related to any LHDC employee. Randy says that most of the votes usually come from balloting, not the public meeting.

LHDC's 2020 public meeting was held on the videoconferencing platform Zoom due to pandemic-related concerns. In addition to the local newspaper, the agency announced the meeting on its website and social media platforms. To protect the privacy of the meeting, the newspaper announcement invited interested parties to call the LHDC office for the Zoom link, which could be emailed to them or shared over the phone. Randy attended the Zoom meeting to take note of the eligibility information that would usually be collected on the sign-in sheet. He says that just like in a normal year, the agency received more votes via mail than those cast at the meeting itself; in fact, LHDC received more mail-in votes in 2020 than it had in previous years. Randy attributes this to clients spending more time at home, and he appreciates the unique opportunity the pandemic created to engage first-time voters in the democratic selection process. Fortunately, LHDC had already taken steps to ensure that participating in the voting process was as convenient as possible, which allowed more individuals to take part.

UTAH COMMUNITY ACTION (UCA)

Targeted Social Media Outreach

Salt Lake City, Utah (Urban)
18 board seats, 6 low-income representatives
CEO: Jennifer Godfrey

Before the pandemic, Utah Community Action used a variety of methods to recruit candidates for its low-income sector election, including posting on its website and distributing fliers. The most successful strategy, however, was traditional face-to-face interactions. Staff members were encouraged to bring up the election in their daily interactions with clients across all of UCA's programs. When two low-income sector board seats opened up in 2020, UCA's ability to do face-to-face recruiting was severely constrained due to gathering restrictions related to COVID-19, but CEO Jennifer Godfrey and her team were undaunted. They came up with an innovative plan that enabled the agency to receive a record number of applications for the open board seats.

First, Jennifer and her team identified geographic hubs with high utilization of UCA services within the service area. Then, they reached out to a digital marketing company and purchased a list of email addresses that allowed them to target Facebook users in those areas with posts promoting low-income sector board service. Out of an abundance of caution, the agency charged the associated costs to unrestricted funds; however, they could have sought approval from their state to charge the costs to CSBG, since they were incurred in furtherance of maintaining the tripartite board. The posts that UCA purchased appeared as any other sponsored post would on a user's Facebook newsfeed. Clicking on the post took users to a webpage containing information about board service as well as an application form. The form asked for a brief biography, in which the candidates could describe their background and their reasons for seeking a seat on the board of directors.

Utilizing an online application process enabled UCA to obtain a record number of candidates for its open low-income sector seats. In previous years, the board has received an average of 2 completed board applications per vacant seat; this year, they received a total of 15. Jennifer thinks that the high level of engagement was likely due to the increase in social media usage while a large portion of the population was stuck at home. She also observed that members of the community were eager to reach out and participate in meaningful work because of the unique difficulties and isolation produced by the pandemic. UCA plans to continue utilizing social media engagement, in addition to face-to-face recruiting, in future elections.

WELFARE REFORM LIAISON PROJECT (WRLP)

Relentless Recruiter

Greensboro, North Carolina (Urban)
15 board seats, 5 low-income representatives
Executive Director: Bernita Sims

WRLP Executive Director Bernita Sims says she is never *not* in recruiting mode for the low-income sector of her tripartite board, which is why she was able to quickly fill an open seat at the beginning of the COVID-19 pandemic. WRLP has long relied on "micro" democratic selection procedures, whereby a CAA asks another group that is representative or comprised primarily of individuals from the low-income community to select someone from their group to sit on the CAA's board. Partnering

with other organizations in this way doesn't just help the CAA fill a seat on its board; it can also foster collaboration and increase the visibility of both organizations.

In the past, WRLP has sent letters to its established partners, like the local housing authority and child care development center, notifying them that the agency is accepting recommendations for representatives for the low-income sector of the board. However, in recent years, Bernita started to sense that some of the populations served by her organization were not being represented on the board. Her concerns deepened when WRLP took part in a local initiative aimed at building resilience and conducting needs assessments around certain local crises. The program brought together about 50 organizations working in the area, most of which Bernita had never heard of.

Bernita brought her concerns back to the board and decided to work with her local nonprofit consortium to identify specific organizations that were made up of the population she felt was missing on the tripartite board. Then, she reached out to those organizations one by one, informing them about CSBG, the tripartite board structure, and the low-income representative sector. She also made it clear that she was looking for candidates who were ready to sit on an active board. She had witnessed too many cases where a board member struggled to participate for years into their term, and just as they got the hang of it, it was time for them to rotate off.

As a result of these efforts, when a seat opened up in the low-income sector on WRLP's board at the end of 2019, Bernita knew exactly who to contact about it. She reached out to one of the organizations she had a relationship with, and they elected one of their leaders with a powerful and fresh perspective. This seamless process was made possible by the investment Bernita had made in connecting her CAA with new low-income constituencies—a strategy she plans to continue beyond the COVID-19 pandemic.

SOLID GROUND

Community Council Supporting Tripartite Board

Seattle, Washington (Urban)

15 board seats, 5 low-income representatives

CEO: Shalimar Gonzales

Solid Ground, a Community Action Agency serving Seattle and the surrounding area, has been on a path of change for the last two years that has positioned it well to conduct democratic selection procedures for its tripartite board during the pandemic. In connection with a complete overhaul of its recruitment and election procedures in 2018, Solid Ground created a Community Accountability Council (CAC) outside of its tripartite board. The council is made up of 11 Solid Ground clients or community members who are interested in developing leadership and advocacy skills while exploring the root causes of poverty and community-driven solutions to address them. "If you have ever wondered why the struggle is so real or questioned why the help you get sometimes makes life harder, this Council may be for you," reads Solid Ground's website.

The CAC meets once a month for a two-hour meeting that may address a number of different topics—from brainstorming how to improve Solid Ground's services, to reviewing policies and documents, to providing feedback and other ideas for advancing the agency's mission. Recently, the CAC has been asked to weigh in on external advocacy opportunities that have arisen when Solid Ground is asked to show its support for a particular cause or piece of legislation. For example, Solid Ground was asked to sign on to a letter requesting a budget commitment to fund the Missing and Murdered Indigenous Women Task Force. The CAC examined the letter, asking critical questions about the work to be done, and ultimately expressed its approval of the agency's public support.

Since CAC members are not board members, they do not risk the loss of legal immunity for their decisions if they are paid by the organization. Thus, Solid Ground is able to provide CAC members a seventy-five dollar per month reimbursement for their time and insight, in addition to providing dinner, childcare, and transportation to meetings.

At the beginning of 2020, Solid Ground received a digital literacy grant from Verizon to provide tablets and laptops to CAC members that did not have them so they could more easily access meeting materials online. Having that technology has allowed the CAC to meet using Microsoft Teams during the pandemic. There has been almost 100% participation in their monthly meetings since March. The CAC's consistency and growth during such an intensely difficult time has reaffirmed to Solid Ground's leadership that the creation of this new body was a good choice. The agency has decided to make the CAC responsible for nominating, vetting, and selecting low-income representatives to the tripartite board. The board also reserves one of the seats on the tripartite board's development committee, which conducts recruitment for the whole board, for a low-income representative.

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