

# Crosswalk:

## CSBG Organizational Standards + Head Start Performance Standards

### Introduction to the CSBG-HSPPS Crosswalk

Community Service Block Grant (CSBG) funding is the bedrock of every Community Action Agency (CAA). For many CAAs, Head Start funding is another integral component of the organization's annual budget, and often represents a CAA's largest funding source. Along with both of these federal awards--CSBG as a block grant passed through from the state, and Head Start as a direct federal grant--come many rules that must be followed in the course of administering the grant. While the CSBG and Head Start programs each have unique aspects, many of these programs' rules are similar and understanding the overlap between the two sets of rules will help reduce compliance burdens and ultimately enhance the quality of the CAA as a whole.

To help CAAs understand this overlap, CAPLAW has developed the following crosswalk showing the connections between two of the main sets of rules that apply to these programs: for CSBG funding, the Organizational Standards published in [Information Memorandum \(IM\) 138](#); and, for Head Start programs, the Head Start Program Performance Standards (HSPPS) located at [45 C.F.R. Parts 1301 through 1305](#).

#### CSBG Organizational Standards

The CSBG Organizational Standards are a comprehensive framework designed to ensure that all CAAs have the capacity to provide high-quality services to low-income individuals and communities. The Organizational Standards encompass 58 standards for nonprofit CAAs and 50 standards for public CAAs. Both sets of Organizational Standards are organized in three thematic groups comprising nine categories. The three thematic groups are: (1) maximum feasible participation, which speaks to the mandate of the federal CSBG Act to engage the communities being served by a CAA in the agency's programs and decision-making to the furthest extent possible; (2) vision and direction, which encompasses organizational leadership, board governance and strategic planning; and (3) operations and accountability, which covers day-to-day operations and management of the CAA, including human resource management, financial operations and oversight, and data and analysis.

#### Head Start Program Performance Standards

The Head Start Program Performance Standards (HSPPS) are the federal regulations that govern the Head Start and Early Head Start programs. Together with the Head Start Act, the HSPPS sets forth the legal requirements with which all Head Start grantees must comply. The HSPPS was comprehensively revised in 2016 to better align with the Head Start Act, as well as to revise and raise educational standards. The HSPPS addresses the practices and policies of Head Start and Early Head Start program, and are grouped in five parts: (1) program governance; (2) program operations; (3) financial and administrative requirements; (4) federal administrative procedures; and (5) definitions.

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## How to Use the Crosswalk

This crosswalk is intended to serve as a practical tool for a CAA to use in the course of compliance with these two sets of standards. The crosswalk is organized by the CSBG Organizational Standards that apply to CAAs (58 Standards that apply to nonprofit CAAs and 50 Standards that apply to public CAAs). For each Organizational Standard, the crosswalk identifies connections to the Head Start Act and/or HSPPS and briefly summarizes the connection, focusing on ways that CAA staff can leverage the overlap between the two sets of requirements to demonstrate compliance with the rules for both programs. These connections are classified using one of the following three labels:

<b><i>Similar Head Start requirement applies</i></b>	Indicates that the Head Start Act and/or HSPPS contain a comparable or similar requirement to the CSBG Organizational Standard.
<b><i>Related but different Head Start requirement applies</i></b>	Indicates that while the Head Start Act and/or HSPPS do not require the same specific action as the CSBG Organizational Standard, there are other Head Start rules addressing the issue covered in the CSBG Organizational Standard.
<b><i>No comparable Head Start requirement applies</i></b>	Indicates that there are no comparable Head Start requirements that address the issue covered in the CSBG Organizational Standard.

CAA staff can use this crosswalk in various ways. First, the crosswalk can aid a CAA in complying with the CSBG Organizational Standards by revealing connections with the HSPPS where compliance work may have already been completed. For example, if a nonprofit CAA is reviewing its compliance with Organizational Standard 1.2, which requires CAAs to analyze information collected directly from low-income individuals as part of the community assessment, the CAA can look to this crosswalk and see that the HSPPS also requires a community needs assessment. By understanding the type of information required to be collected in the Head Start community needs assessment, the CAA can ensure that the staff or board members engaged in this compliance review collaborate with Head Start staff on these similar requirements, enabling the CAA to streamline or share data collection efforts. Further, CAAs can leverage the information collected as part of one needs assessment to inform the program strategies and activities of the other program and/or conduct a single, agency-wide community needs assessment that meets all applicable requirements.

As a further example, if a nonprofit CAA is reviewing compliance with Organizational Standard 7.8, which requires all staff to participate in a new employee orientation within 60 days of hire, the CAA will see in the crosswalk that the HSPPS also includes orientation requirements. Specifically, the HSPPS requires the Head Start program to provide to all new staff, consultants, and volunteers an orientation that focuses on, at a minimum, the goals and underlying philosophy of the program and on the ways they are implemented. Being aware of these similar requirements will allow the CAA to coordinate reviewing and updating its orientation materials with the Head Start program to avoid duplicative or non-compliant orientation programs.

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Second, this crosswalk can be used by Head Start staff in ensuring compliance with the HSPPS. For example, the HSPPS includes a requirement, based on language in the Head Start Act, that each Head Start program annually publish a report containing various information about the operation of the program, such as the total amount of public and private funds received and the amount from each source, an explanation of budgetary expenditures and proposed budget for the fiscal year, and the total number of children and families served. The Head Start program staff can search the crosswalk for information about this requirement and will see that the Organizational Standards include a similar but more general requirement that a CAA communicates its activities and its results to the community. By making this connection, the Head Start program may save time and effort by collaborating with the CAA's overall efforts to communicate programmatic information to the community served.

Lastly, this crosswalk can be useful as a tool to foster greater coordination and integration between the Head Start program and the rest of the CAA's activities. For example, as part of the onboarding process for new staff or as part of a regular training, staff from across the organization can review this crosswalk to understand the overlap and similarity between the two sets of standards. This crosswalk can aid staff in identifying areas of overlap between CSBG and Head Start requirements and discussing opportunities to strengthen the integration of the Head Start program with the rest of the CAA's operations. CAA staff can also review the publication, "Cases of Integration: Community Action and Head Start" (available [here](#)) for additional examples of how CAAs integrate the governance, leadership, and financial management of Head Start programs with the agency as a whole.

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