Public CAA Quarterly Meeting

CSBG in Public CAAs

6/18/2024

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The Promise Of Community Action



Community Action changes people's lives, embodies the spirit of hope, improves communities, and makes America a better place to live. We care about the entire community and we are dedicated to helping people help themselves and each other.

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Agenda

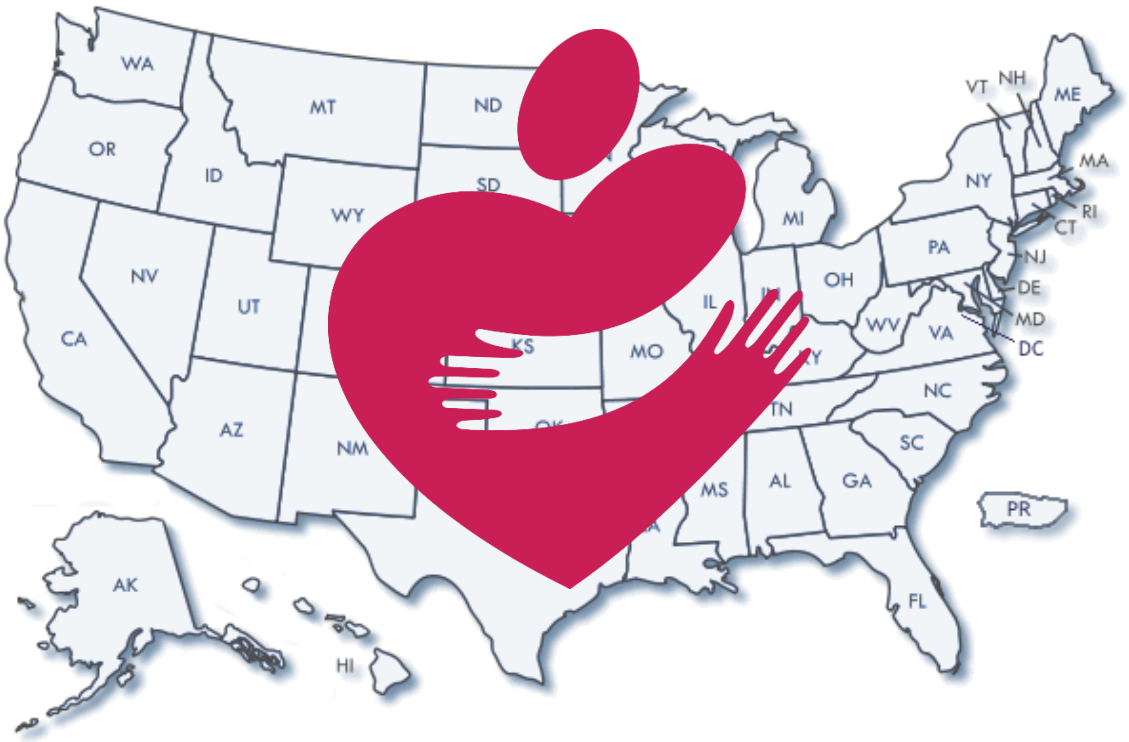
- Community Action History & Context
- CSBG Basics
- CSBG Approaches in Public CAAs

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Community Action Network

Red, Blue, Purple States

Board and Staff on All Sides of the Aisle

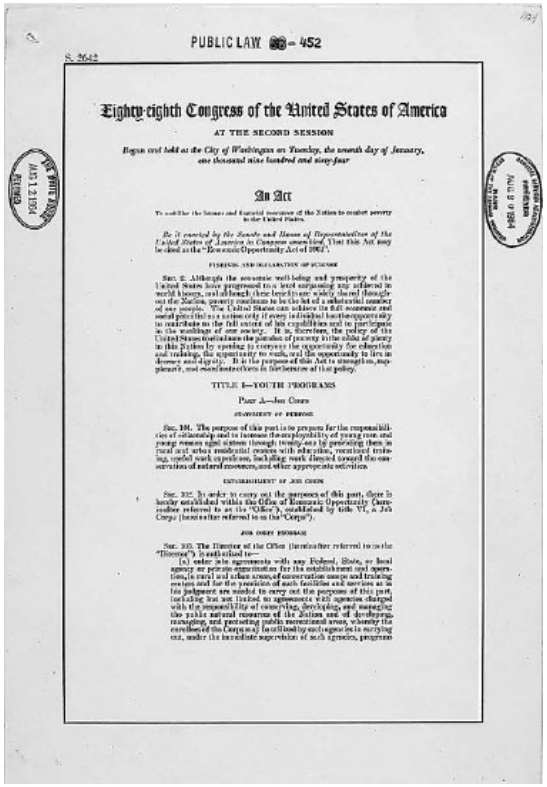


1000+ Agencies | 44 State Associations | 50+ State CSBG Offices| National Partners
More than 15 million served

We work together to promote workable solutions that connect more families to opportunity

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August 1964 - Signing of the Economic Opportunity Act



PUBLIC LAW 88 - 452

S. 2642

Eighty-eighth Congress of the United States of America

AT THE SECOND SESSION

Begun and held at the City of Washington on Tuesday, the seventh day of January, one thousand nine hundred and sixty-four

An Act

To authorize the human and financial resources of the Nation to combat poverty in the United States.

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled, That this Act may be cited as the "Economic Opportunity Act of 1964".

FINDINGS AND DECLARATION OF PURPOSE

SEC. 2. Although the economic well-being and prosperity of the United States have progressed to a level surpassing any achieved in world history, and although these benefits are widely shared throughout the Nation, poverty continues to be the lot of a substantial number of our people. The United States can achieve its full economic and social potential as a nation only if every individual has the opportunity to contribute to the full extent of his capabilities and to participate in the workings of our society. It is, therefore, the policy of the United States to eliminate the paradox of poverty in the midst of plenty in this Nation by opening to everyone the opportunity for education and training, the opportunity to work, and the opportunity to live in decency and dignity. It is the purpose of this Act to strengthen, supplement, and coordinate efforts in furtherance of that policy.

TITLE I—YOUTH PROGRAMS

Part A—Job Corps

STATEMENT OF PURPOSE

SEC. 101. The purpose of this part is to prepare for the responsibilities of citizenship and to increase the employability of young men and young women aged sixteen through twenty, inclusive, by providing them in rural and urban residential centers with education, vocational training, useful work experience, including work directed toward the conservation of natural resources, and other appropriate activities.

ESTABLISHMENT OF JOB CORPS

SEC. 102. In order to carry out the purposes of this part, there is hereby established within the Office of Economic Opportunity (hereinafter referred to as the "Office"), established by title VI, a Job Corps (hereinafter referred to as the "Corps").

JOB CORPS PROGRAMS

SEC. 103. The Director of the Office (hereinafter referred to as the "Director") is authorized to—

(a) enter into agreements with any Federal, State, or local agency or private organization for the establishment and operation, in rural and urban areas, of conservation camps and training centers and for the provision of such facilities and services as in his judgment are needed to carry out the purposes of this part, including but not limited to agreements with agencies charged with the responsibility of conserving, developing, and managing the public natural resources of the Nation and of developing, managing, and protecting public recreational areas, whereby the enrollees of the Corps may be utilized by such agencies in carrying out, under the immediate supervision of such agencies, programs



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Our Catalytic Mission

Title II, Section 201 (a), of the Economic Opportunity Act
The basic purpose of Community Action is:
"*to stimulate a better focusing of all available local, state, private, and Federal resources* upon the goal of enabling low-income families, and low-income individuals of all ages, in rural and urban areas, to attain the skills, knowledge, and motivations, and secure the opportunities needed for them to become self-sufficient."

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Two Big Ammendments to Address Influence of Communtiy Action

GREEN Amendment

- 1967: stipulated that local elected officials had authority to designate the official CAA for their areas. Most were certified but a few big cities took control and replaced the existing CAA.

QUIE Amendment

- 1967: stipulated that 1/3 of board must be composed of elected officials and 1/3 would be private sector representatives. This limited "maximum feasible participation" of people elected by people experiencing poverty on the boards to at least 1/3 of the membership

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So, what's a Public Community Action Agency? How is it different?

A Public CAA is one that is situated within a unit of local government, and is administered by the local government (as opposed to a private CAA which is a nonprofit and administered under the direction of the board).

Key difference: The governing body

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1981: The Community Services Block Grant (CSBG) was Born

- State offices were now installed as recipients of the Block Grant funding and therefore as intermediaries for local Community Action Agencies.
- 90% of the CSBG funds were to be used at the local level
- Eligible CAAs were the same organizations previously eligible under OEO and CSA determinations. They were “Grandfathered.”
- States had the responsibility for monitoring CAAs and could spend up to 5% of the State’s CSBG allocation for administrative purposes. The remaining 5% was designated for State discretionary anti-poverty funded activities.

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CSBG is (spoiler alert): A Block Grant

- Federal Oversight
  - General, high-level guidance
  - Allocates money appropriated by Congress to the States/Territories/Tribes using a formula
    Feds monitor states for compliance



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State Administration

- States are charged with developing the state-level guidance for CAAs to administer CSBG
  - Allocate at least 90% of the funds received by the Office of Community Services (OCS) to Eligible Entities
  - Develop state-specific policies and guidance for things like eligibility determination, Community Assessment requirements, Community Action Plans, timelines and processes for reporting, other administrative requirements

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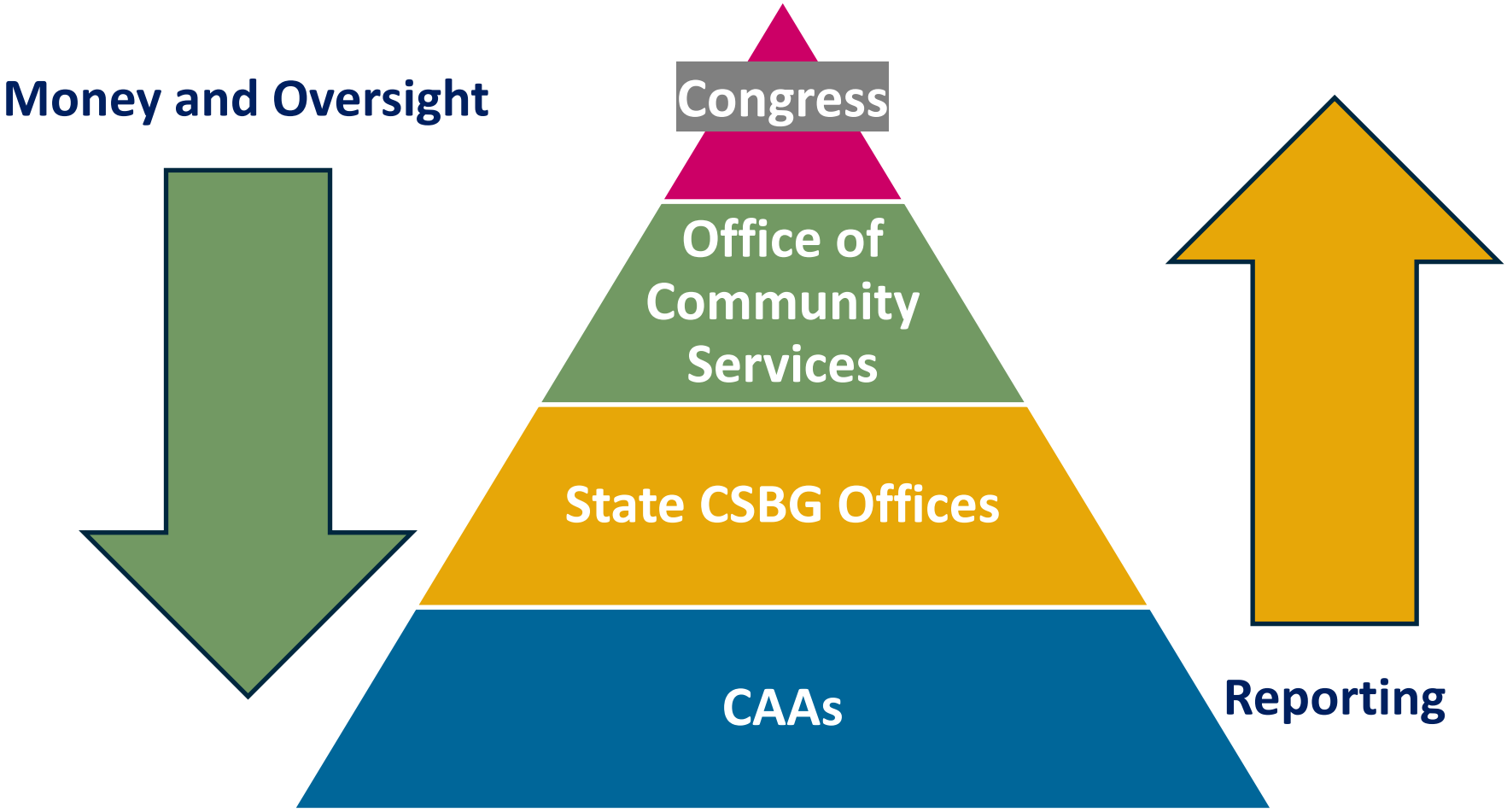
What Makes Me an Eligible Entity?

- Designation by the State
- Tripartite Board
  - Tripartite board structure required by the CSBG Act
  - Additional board requirements may be put in place by your state



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Stage Setting: How the Money (And Oversight) Works



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So, what's in the CSBG Act?

- Purpose
- Eligible Entity Requirements
- Allocation Requirements
- Community Action Board Requirements
- Community Assessment & Community Action Plan
- ROMA
- Reporting
- Unallowable costs

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CSBG Purpose

The purposes of this subtitle are—

''(1) to provide assistance to States and local communities, working through a network of community action agencies and other neighborhood-based organizations, for the reduction of poverty, the revitalization of low-income communities, and the empowerment of low-income families and individuals in rural and urban areas to become fully self-sufficient (particularly families who are attempting to transition off a State program carried out under part A of title IV of the Social Security Act (42 U.S.C. 601 et seq.)); and

- 42 USC 9901

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CSBG Purpose cont.

“(2) to accomplish the goals described in paragraph (1) through—

> “(A) the strengthening of community capabilities for planning and coordinating the use of a broad range of Federal, State, local, and other assistance (including private resources) related to the elimination of poverty, so that this assistance can be used in a manner responsive to local needs and conditions;

- 42 USC 9901

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CSBG Purpose cont.

"(B) the organization of a range of services related to the needs of low-income families and individuals, so that these services may have a measurable and potentially major impact on the causes of poverty in the community and may help the families and individuals to achieve self-sufficiency;

"(C) the greater use of innovative and effective community-based approaches to attacking the causes and effects of poverty and of community breakdown;

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CSBG Purpose cont.

"(D) the maximum participation of residents of the low-income communities and members of the groups served by programs assisted through the block grants made under this subtitle to empower such residents and members to respond to the unique problems and needs within their communities; and

"(E) the broadening of the resource base of programs directed to the elimination of poverty so as to secure a more active role in the provision of services for—

> *"(i) private, religious, charitable, and neighborhood-based organizations; and*
>
> *"(ii) individual citizens, and business, labor, and professional groups, who are able to influence the quantity and quality of opportunities and services for the poor.*

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CSBG is meant to be a flexible funding stream that allows the local level to build strategies that address their unique needs

States cannot direct a CAA on how they will use CSBG funds.

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Allowability in CSBG

- If a cost aligns with the purpose of CSBG, is identified as a need/opportunity in the community assessment, is not specifically prohibited, and is allowable under OMB Uniform Guidance, and the State approves, it can be allowable under CSBG
  - CSBG Prohibited Costs:
    - Political activities, including voter registration activities
    - Purchase/permanent improvement of land or property

- 42 USC 9918

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So, What's Allowable?

(A non-exhaustive list)

- Services to individuals and families that support them to become "self-sufficient"
- Using CSBG to coordinate several funding streams to better serve families
- Creating opportunities for people with low-incomes to engage in the community/build power
- Supporting community-level initiatives that support the revitalization of communities with low-incomes and improving the conditions of communities where people with low incomes live
- Organizational capacity building, including training for staff
- Using CSBG to cover administrative overhead

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What's Not in the CSBG Act?

- Eligibility Criteria outside of % of FPL
  - States develop eligibility criteria
- Specific allowability guidance beyond what is not allowed
- Specific administrative cap for agencies
  - NOTE that the definition of administration in CSBG is different than other programs (see CSBG IM 37): https://www.acf.hhs.gov/ocs/policy-guidance/csbg-im-37-definition-and-allowability-direct-and-administrative-cost-block

Community Action Models



Direct Service Provision

Financial Assistance

Coaching/Case Management

Workforce Services



Systems-Level Change Agents

Advocacy

Community Coalition Leaders



Community Organizers & Builders

Funders (Subcontracts)

Community Outreach & Education

Civic Engagement

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How do you use your CSBG?

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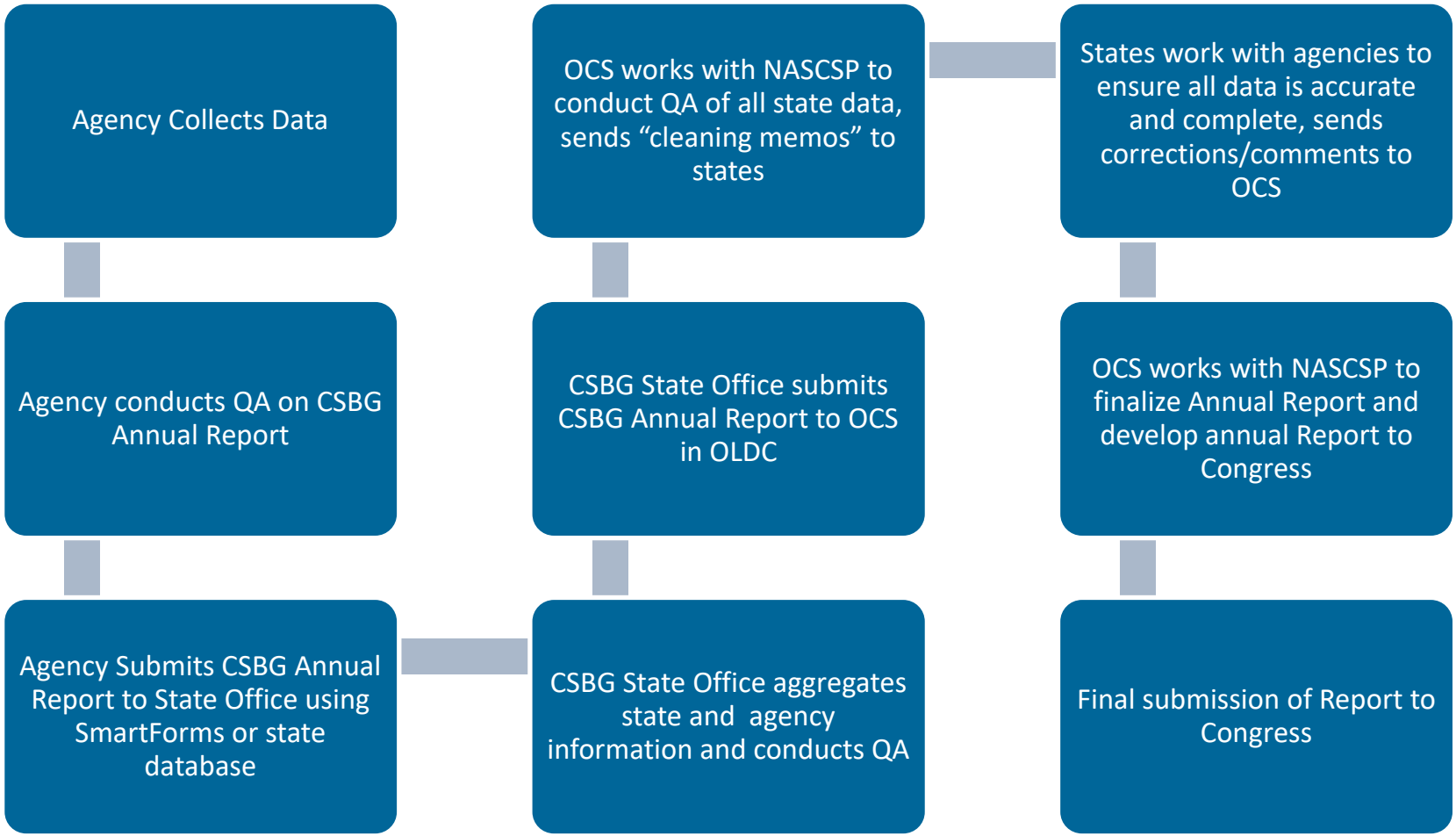
CSBG Annual Report

- Under the CSBG Act, States are required to submit an **annual report** detailing the use of CSBG funds, information on the eligible entities (CAAs), and performance results.

- The CSBG Annual Report includes activities of the entire CAA, not just CSBG*
  - Public CAAs report on the activities of the programs administered by the tripartite board

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CSBG Reporting Flow and Process



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How is the CSBG Annual Report used?

- Different uses at different levels:
  - Local
  - State
  - National



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CSBG Annual Report

Serves important purposes at the national level:

- Provides the basis for the Congressional Report
- Supports telling the national CSBG story

Serves important purposes at the state level:

- Supports telling the statewide CSBG story
- Tool for the state to fulfill their oversight & management function

Serves important purposes at the local level:

- Understanding organizational impact
- Supports telling the local CSBG story
- Performance Improvement

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CSBG Annual Report OMB Clearance

- Current CSBG Annual Report OMB clearance expires June 2024
- Updated CSBG Annual Report has been posted for public comment here
- **Timeline**
  - Federal Register Notice # 1: April 22, 2024 (60-day comment period)
    - **Comment Period Closes: June 21, 2024**
  - Federal Register Notice # 2: June 28, 2024 or before (30-day comment period)
  - Anticipated OMB Clearance: Winter 2024
    - FFY 2025 (Oct 1, 2024 – Sep 30, 2025) – Option to use revised current report or new CSBG Annual Report
    - FFY 2026 (Oct 1, 2025 – Sep 30, 2026) – Network will use new CSBG Annual Report

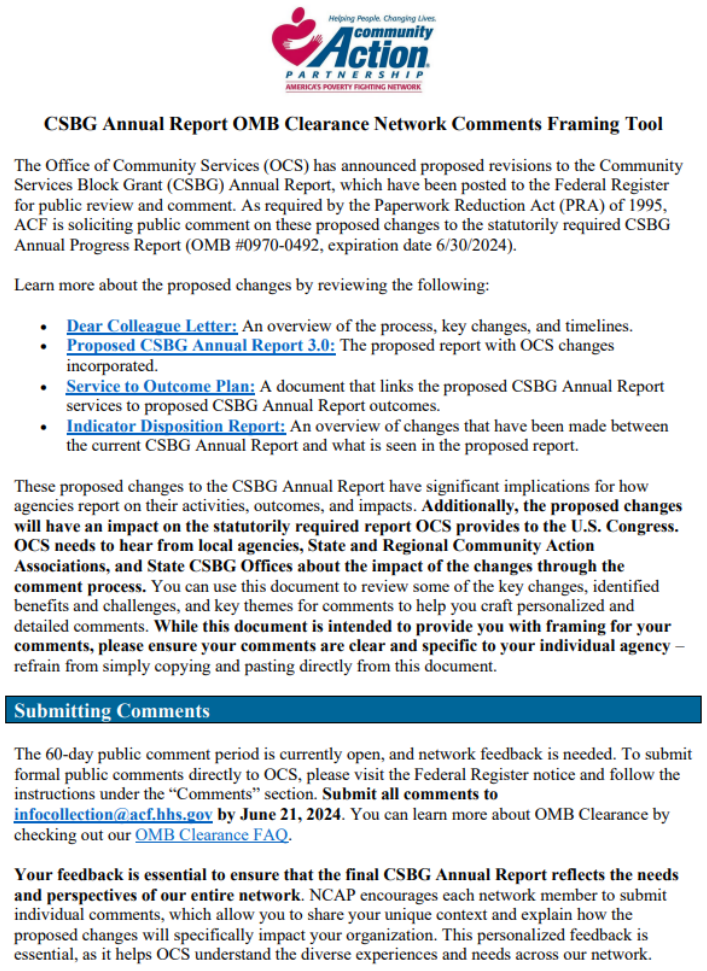
Submitting Comments

- Network members (CAAs, Associations, State Offices) and the general public can provide comments by emailing infocollection@acf.hhs.gov
  - Make sure to identify all comments by the title of the information collection: "*Proposed Information Collection Activity; Community Services Block Grant (CSBG) Annual Progress Report (Office of Management and Budget No. 0970-0492).*"
  - Keep comments clear, concise, and specific to your organization – avoid copy/paste
  - Comments do not need to answer all questions posed by OCS, and can be as simple as an email detailing key feedback for consideration
  - Check with your agency leadership about process for submitting comments

Use Our New Comments Framing Tool!

Use this document to review some of the key changes, identified benefits and challenges, and key themes for comments to **help you craft personalized** and detailed comments.

Access the tool here



CSBG Annual Report OMB Clearance Network Comments Framing Tool

The Office of Community Services (OCS) has announced proposed revisions to the Community Services Block Grant (CSBG) Annual Report, which have been posted to the Federal Register for public review and comment. As required by the Paperwork Reduction Act (PRA) of 1995, ACF is soliciting public comment on these proposed changes to the statutorily required CSBG Annual Progress Report (OMB #0970-0492, expiration date 6/30/2024).

Learn more about the proposed changes by reviewing the following:

- **Dear Colleague Letter:** An overview of the process, key changes, and timelines.
- **Proposed CSBG Annual Report 3.0:** The proposed report with OCS changes incorporated.
- **Service to Outcome Plan:** A document that links the proposed CSBG Annual Report services to proposed CSBG Annual Report outcomes.
- **Indicator Disposition Report:** An overview of changes that have been made between the current CSBG Annual Report and what is seen in the proposed report.

These proposed changes to the CSBG Annual Report have significant implications for how agencies report on their activities, outcomes, and impacts. **Additionally, the proposed changes will have an impact on the statutorily required report OCS provides to the U.S. Congress. OCS needs to hear from local agencies, State and Regional Community Action Associations, and State CSBG Offices about the impact of the changes through the comment process.** You can use this document to review some of the key changes, identified benefits and challenges, and key themes for comments to help you craft personalized and detailed comments. **While this document is intended to provide you with framing for your comments, please ensure your comments are clear and specific to your individual agency** – refrain from simply copying and pasting directly from this document.

Submitting Comments

The 60-day public comment period is currently open, and network feedback is needed. To submit formal public comments directly to OCS, please visit the Federal Register notice and follow the instructions under the "Comments" section. **Submit all comments to infocollection@acf.hhs.gov by June 21, 2024**. You can learn more about OMB Clearance by checking out our OMB Clearance FAQ.

Your feedback is essential to ensure that the final CSBG Annual Report reflects the needs and perspectives of our entire network. NCAP encourages each network member to submit individual comments, which allow you to share your unique context and explain how the proposed changes will specifically impact your organization. This personalized feedback is essential, as it helps OCS understand the diverse experiences and needs across our network.

Need Help?

Join NCAP for Office Hours: CSBG Annual Report Proposed Changes Public Comments & Feedback

Tuesday, June 18, at 3 PM ET | 2 PM CT | 1 PM MT | 12 PM PT

Register and Learn More:

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Resources



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Bronze Tier

The place to explore the Standards of Excellence and start building excitement among your team. Enroll anytime. The Bronze Tier can usually be completed in 3 months.

Silver Tier

The place to learn how to do a self-study, build knowledge, and explore the peer-feedback process. Enroll in February or July. The Silver Tier can usually be completed in 9 months.

HERE?

OR HERE?

Gold Tier

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Platinum Tier

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communityactionpartnership.com/pathways-to-excellence/

SCAN ME

CAPLAW
Mastering the A-B-CSBGs Series

- Tripartite Board Selection and Composition
- Uses of CSBG Funds
- Mechanics of CSBG
- Monitoring and Termination



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2024 ANNUAL CONVENTION

Inspiring Hope and Advancing Opportunity

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