



CENTER FOR COMMUNITY SERVICES DIRECTIVE

Title: Organizational Standards
Directive #: C2019-07
Effective: October 1, 2019

To: Community Services Block Grant Subgrantees

From: Lynette Praster, Director – Center for Community Services

A handwritten signature in black ink, appearing to read 'LMP', is written over the 'From:' line.

1.0 Purpose

The purpose of this directive is to reinforce the required implementation of the Community Services Block Grant (CSBG) Organizational Standards and to provide guidance to CSBG eligible entities (CEE) about compliance with Organizational Standards.

2.0 Revision History

This CSBG Directive is effective October 1, 2019 and replaces C2018-07.

3.0 Background

The Organizational Standards Center of Excellence (COE) was developed to assist states and local CEEs set and meet organizational expectations across the CSBG network. The COE was called upon to develop the standards with input from all key stakeholders, and to create tools for organizational assessment used by states and CEEs to set, achieve, and maintain high-quality organizational expectations and to enhance accountability. COE Organizational Standards were developed in collaboration with the federal Department of Health and Human Services (HHS) Office of Community Services (OCS), national Community Action Partnership (CAP), state CSBG lead agencies, state CSBG associations, and community action agencies across the nation.

The purpose of the Organizational Standards is to ensure that all eligible entities have appropriate organizational capacity, not only in the critical financial and administrative areas important to all nonprofit and public human service agencies, but also in areas of unique importance for CEEs. Accordingly, in Pennsylvania all CEEs are required to identify and report compliance with the standards.

Organizational Standards work together to characterize an effective and healthy organization. Some

standards have direct linkage to the federal CSBG Act, while others link to federal Office of Management and Budget (OMB) guidance. In their entirety, the standards reflect requirements of the CSBG Act, applicable federal laws and regulations, good management practices, and have become stepping stones to the Pathways to Excellence program, but most importantly they reflect the values of the community action network.

4.0 Policy

As part of Pennsylvania's continuing implementation of and compliance with the Organizational Standards, all CEEs are required to routinely review, update, and substantiate the Organizational Standards on an ongoing basis. The Community Organization Planning and Outcomes System (COPOS) is the official system of record for CEEs to report compliance with Organizational Standards.

There are 58 Organizational Standards for private, non-profit CEEs, and 50 Organizational Standards for public CEEs. The Organizational Standards are organized into three thematic groups comprising nine categories associated with the following areas of CEE operations:

1. Maximum Feasible Participation
 - Consumer Input and Involvement
 - Community Engagement
 - Community Assessment
2. Vision and Direction
 - Organizational Leadership
 - Board Governance
 - Strategic Planning
3. Operations and Accountability
 - Human Resource Management
 - Financial Operations and Oversight
 - Data and Analysis

Agency executive directors must approve Organizational Standards in COPOS. Refer to CSBG Directive C2018-05 for additional information about CSBG reporting requirements.

As the CSBG State Lead Agency responsible for oversight of CSBG, the Department's Center for Community Services is responsible for monitoring to assure CEE compliance with the requirements of the CSBG Act, including Organizational Standards. The Department assesses the status of standards among all CEEs, including annual reporting to OCS in the CSBG Annual Report. Assessment of Organizational Standards compliance is conducted routinely throughout the year, and as part of annual CEE monitoring. This routine and consistent monitoring ensures the Department meets its requirement to independently verify CEE compliance with Organizational Standard requirements.

The general expectation is that agencies maintain 100% compliance with the standards as that is the baseline requirement according to federal regulations. The State Plan goal for Pennsylvania is set at 85 – 88% of agencies are at 100% compliance at any given time. A report containing information regarding agency compliance is generated based on the information in COPOS as of September 30th and is sent to the federal Office of Community Services as part of the CSBG Annual report.

As a result of monitoring, if the Department finds a CEE to be non-compliant with a standard or set of standards, the necessary corrective actions will depend on the circumstances. For any Organizational Standard that the agency is non-compliant, corrective action should be taken to achieve compliance in a minimal amount of time. In cases where the CEE may be unable to meet the standard in a reasonable timeframe contingent on targeted technical assistance, the Department may require the CEE to develop a Technical Assistance Plan (TAP) that identifies and targets training and technical assistance resources and specifies a timeframe for the CEE to meet the standards. When appropriate in serious or persistent situations, the Department may initiate action in accordance with section 687C of the CSBG Act to establish a Quality Improvement Plan (QIP) with clear, specific timelines and benchmarks to identify progress toward compliance.

The failure of a CEE to consistently meet Organizational Standards may reflect deeper organizational challenges and risks. In these instances, the Department must determine whether it is necessary to take additional actions including reduction or termination of funding in consultation with OCS. For additional information on monitoring policies, please see Directive C2019-06 Risk Based Monitoring

Attachment A outlines acceptable documentation for private non-profit CEEs that should be uploaded into COPOS to substantiate compliance with the Organizational Standards. Attachment B outlines acceptable documentation for public CEEs that should be uploaded into COPOS to substantiate compliance with the Organizational Standards. CEEs have the ability and are required to add statements in COPOS to support or clarify documents intended to demonstrate compliance with standards.

5.0 Effective Date

This directive takes effect October 1, 2019 and replaces C2018-07. It will remain in effect, in its entirety, until it is amended, replaced, superseded, or nullified. Only a directive from the Department's Center for Community Services or its equivalent may countermand any statement herein contained.

6.0 Attachments

Attachment A – Organizational Standards for Private Organizations

Attachment B – Organizational Standards for Public Organizations

7.0 Appendices

Appendix A – Sample of board signature for training that is required every two (2) years.

Appendix B – Sample of board signature form for conflict of interest.

Appendix C – Sample of board signature form for required orientation.

Appendix D – Sample of employee signature form of receipt of personal policies/employee handbook.

cc: Center for Community Services Staff
Fiscal Management Center, DCED

