



Department of Social Services
Community Services Block Grant

Documentation Guide for Organizational Standards Assessment

Revised January 2021

CSBG Guide to Organizational Standards Assessment

Missouri Department of
Social Services
Family Support Division

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PART 100 – BACKGROUND

Under the block grant framework established in the CSBG Act, States have both the authority and the responsibility for effective oversight of eligible entities that receive CSBG funds. Section 678B of the CSBG Act (42 U.S.C. § 9914) requires State CSBG Lead Agencies to establish “performance goals, administrative standards, financial management requirements, and other requirements” that ensure an appropriate level of accountability and quality among the State’s eligible entities. In order for States to meet these responsibilities under the CSBG Act, States must establish and communicate clear and comprehensive standards, and hold eligible entities accountable according to the standards as part of their oversight duties.

In 2012, the U.S. Department of Health and Human Services (HHS) funded a cooperative agreement for the CSBG Organizational Standards Center of Excellence (COE). The two-year cooperative agreement – with input from local, State, and national partners – coordinated the development and dissemination of a set of organizational standards for Community Action Agencies (CAA’s) for the purpose of ensuring that all CSBG eligible entities have the capacity to provide high-quality services to low-income individuals and communities. In March, 2014, HHS published a draft information memorandum with the draft organizational standards. The final result of the COE and HHS efforts is a comprehensive set of organizational standards developed by and for the CSBG Network. HHS published Information Memorandum (IM) 138 January 26, 2015, disseminating the final Organizational Standards across all CAA’s. Compliance was required beginning October 1, 2015 (FFY 2016).

The Missouri Department of Social Services (Department) has adopted the COE-developed Standards and Tools for assessment of the Standards. The full text of the Standards including examples of required documentation is included with this guide.

PART 200 – MISSOURI’S ASSESSMENT PLAN FOR ORGANIZATIONAL STANDARDS

200.01 General Information

Issued in January 2015, IM 138 addressed the implementation of the CSBG Organizational Standards across the CSBG Network. Implementation will impact State CSBG Lead Agencies, CAAs, HHS, State Associations, and National CSBG Partners.

As part of CSBG Organizational Standards implementation, State CSBG Lead Agencies will need to:

- Project how many CAAs will meet the CSBG Organizational Standards each year as part of their CSBG State Plan;
- Assess all CAAs against the Organizational Standards each year;
- Ensure Technical Assistance Plans (TAP) are in place for CAAs not meeting Organizational Standards;
- Ensure Quality Improvement Plans (QIP) are in place for CAAs with serious issues as described in IM 116; and
- Report on the percentage of CAAs meeting 100% of the Standards each year in the State’s Annual Report.

For states that currently monitor annually, an annual assessment of the Organizational Standards will align with the existing monitoring calendar. For others, assessing CAAs in the years without onsite monitoring may pose unique challenges. IM 138 recognizes this and provides states flexibility in how they assess CAAs along the CSBG Organizational Standards. This guide provides Missouri’s assessment strategy on how it will implement an annual review of the Organizational Standards.

200.02 Annual Assessment Plan

Per IM-138, State CSBG Offices are to assess each eligible entity annually on the Organizational Standards as set forth in the State’s policy and regulations. CSBG Staff will conduct a full review of all documents annually. Each agency must submit annually a new fully completed Community Action Plan (Work Plan) using the most recently approved template, in addition to all documents supporting compliance with the Standards such as risk assessments, board minutes, bylaws, needs assessments, strategic plans, etc., via the automated missouri.orgstandards.com Organizational Standards Module.

After the annual submission date has closed, CSBG Staff will offer a cure period for agencies to provide clarification or corrected documents for any Standards not met. After the close of the cure period, CSBG Staff will issue either a Technical Assistance Plan (TAP) or Quality Improvement Plan (QIP) to any agency with unmet Standards.

Annual Assessment Process

Annually, CSBG Staff will conduct a full desk assessment according to the following plan.

- Agencies must submit annually by the date indicated in the most recent Key Dates document:
 - o A completed, Department Approved Community Action Plan (Work Plan); and
 - o Supporting documentation for all Standards.

- CSBG Staff will conduct a desk review and, if after the cure period one or more Standards are not met, issue one of the following reports:
 - o TAP for any Standard not met for the first time; or
 - o QIP for any Standard not met during any previous fiscal year.
- In years when CSBG Staff conduct an onsite monitoring of an agency, CSBG Staff will review documents submitted during the most recent annual assessment of the Standards, as needed. The results of the on-site review will be included in the monitoring report as a Contract Finding. During the monitoring, CSBG Staff will provide targeted training and technical assistance to move an agency to compliance with all Standards.

200.03 Issuance of Reports and Follow-Up

After CSBG Staff review each agency's submission, staff will determine if the Standard has been met or not met according to the guidelines stated in this policy, and the minimum required documentation as provided in Part 400. CSBG Staff will complete a summary of the Standards and draft a Technical Assistance Plan (TAP) or a Quality Improvement Plan (QIP) as defined below.

Technical Assistance Plan (TAP)

- A Standard is not met.
- The TAP will outline the actions the agency must take, as well as the time-frame for correction to be in compliance moving forward, and identify the responsible staff for oversight of the resolution.
- The Standard(s) specified within the TAP will remain unmet and denied for the current Assessment period.

Quality Improvement Plan (QIP)

- If appropriate in certain situations, CSBG Staff may initiate action in accordance with section 678C of the CSBG Act (42 U.S.C. § 9915), including the establishment of a Quality Improvement Plan (QIP) with clear timelines and benchmarks for progress.
- The QIP will outline the actions the agency must take, as well as the time-frame for correction and any benchmarks to be achieved.
- The time-frame allowed for correction will depend on which Standard(s) are in non-compliance and may vary depending on the agency, i.e., the agency may have additional time because of approvals needed from the board.
- If CSBG Staff are confident that the agency is moving toward meeting the Standards, CSBG Staff may choose not to initiate action to terminate or reduce funding.

200.04 Timeframes

The due date of the Organizational Standards Assessment documents will determine the date for a document to be considered timely. Please refer to the most recent Key Dates document.

PART 300 – INSTRUCTIONS FOR SUBMISSION

300.01 General Instructions

Agencies shall submit the supporting documentation for all Standards no later than the date indicated in the most recent Key Dates document, via [missouri.orgstandards.com](https://www.missouri.orgstandards.com), Organizational Standards Module. The system has the capacity to “clone” previous year’s documents.

Please be sure to review and revise any documents carrying over from one year’s submission to the next to ensure accuracy and appropriateness.

300.02 Online [missouri.orgstandards.com](https://www.missouri.orgstandards.com) Submission Process

Some basic steps to completing the online submission process are as follows:

1. Agency User Submission Steps
 - a. Website URL - <https://www.missouri.orgstandards.com>
 - b. Click on “Organizational Standards Tab”
 - c. To add a Field Assessment Guide for current year, click on “Add New Fiscal Year”
 - i. New Field Assessment Guide Fiscal year will display in table
 - d. To add document to a standard click on Add a New Document
 - i. Browse computer for file (PDF ONLY)
 - ii. Select Upload File to be directed to the next page
 - iii. Choose document effective date, what category it falls under, the associated Standard, and specific page citations are required
 - e. Repeat step D until the entire Field Assessment Guide is complete and all documents are uploaded
2. Organizational Standards deadline is 11:59pm of the date indicated in the most recent Key Dates document.
 - a. The module will lock and submit automatically
 - b. An agency may make any changes or additions to the module up until the window is locked.

Agencies will need to demonstrate they have met all Standards annually. Many individual Standards require action on an annual basis, while others do so on a biannual, triennial, or even five year span. Agencies will need to collect and maintain materials and documents that may not change over a five year period (e.g. bylaws). In addition, agencies must create and maintain certain documents on a more regular basis, such as monthly board minutes, semiannual and, quarterly reporting documents. Some documents may be used to demonstrate compliance with multiple Standards. Agencies may choose how to collect and store the documents; however, all documents submitted via [missouri.orgstandards.com](https://www.missouri.orgstandards.com) must be saved as a PDF.

300.03 Cure Period

Once the submission period has closed, CSBG Staff will review the submissions for each agency. If an agency fails to meet one or more Standards, CSBG Staff will contact each agency with information as to which Standard(s) were / were not met. The agency will have a specified cure period in which to submit the documents to CSBG Staff to satisfy the Standard.

After the initial review and cure period, the documents will either be approved or denied by CSBG Staff. CSBG Staff will initiate the appropriate reports.

PART 400 - Documentation Guide

This part of the Documentation Guide provides agencies a complete listing of all Organizational Standards. The full language of the Standard is included, along with guidance as to what the Standard means. Each Standard is listed separately on a single page.

This section also provides a listing of one or more types of documentation that is **required** of each agency at a minimum in order to meet the Standard. Agencies must use this Documentation Guide to compile the documentation necessary for submitting via missouri.orgstandards.com. If there are extenuating circumstances preventing the agency from providing the specified minimum documentation, the agency should submit a written explanation, requesting further consideration as acceptable documentation. The expected timeframe and steps to be taken to meet the Standard must be included in the request.

Additional information and guidance regarding the Organizational Standards may be found on the Community Action Partnership's website at <https://communityactionpartnership.com/organizational-standards/>.

Maximum Feasible Participation – Category 1: Consumer Input and Involvement

Standard 1.1 The organization demonstrates low income individuals participation in its activities.

Maintained: On an ongoing basis, not to exceed one year from time of effective date

Guidance:

- This standard is meant to embody “maximum feasible participation”.
- The intent of this standard is to go beyond board membership; however, board participation may be counted toward meeting this standard if no other involvement is provided.
 - The tripartite board is only one of many mechanisms through which CAAs engage people with low- incomes.
- Participation can include activities such as Head Start Policy Council, tenant or neighborhood councils, and volunteering, etc.
- Though not mandatory, many CAAs meet this standard by including advisory bodies to the board.
- Agencies do not need to send income documentation to prove low-income participation.

Minimum Required Documentation:

- CAA must provide at least one of the following:
 - Volunteer lists and supporting documentation; or
 - Board member roster showing members of the low-income sector.

Maximum Feasible Participation – Category 1: Consumer Input and Involvement

Standard 1.2 The organization analyzes information collected directly from low income individuals as part of the community assessment.

Maintained: Every 3 years

Guidance:

- This standard reflects the need for CAAs to talk directly with low-income individuals regarding the needs in the community.
- Data can be collected through a variety of ways including, but not limited to, focus groups, interviews, community forums, customer surveys, etc.
- Analyzing the information can be met through review of the collected data by staff and/or board, including a review of collected data in the written community assessment, with notations of this review in the Assessment's Appendix, committee minutes, etc.

Minimum Required Documentation:

- CAA must provide **all** of the following:
 - The most recent, Community Needs Assessment document, including and clearly identifying the methodology section which details the processes to include low income in data collection, **and** at least one of the following:
 - Backup documentation/data summaries; or
 - Interview transcripts; or
 - Client/customer surveys.

Maximum Feasible Participation – Category 1: Consumer Input and Involvement

Standard 1.3 The organization has a systematic approach for collecting, analyzing, and reporting customer satisfaction data to the governing board.

Maintained: Maintain on an ongoing basis, not to exceed one year from time of effective date

Guidance:

- This reflects the need for any business to gather information regarding customer satisfaction. All organizations need to be aware of how satisfied their customers are of the services they receive.
- This standard does not imply that a specific satisfaction level needs to be achieved.
- Documentation is needed to demonstrate all three components in order to meet the standard: 1) collection, 2) analysis, and 3) reporting of data.
- A systematic approach may include, but not be limited to, surveys or other tools being distributed to customers annually, quarterly, or at the point of service (or on a schedule that works for the individuation CAA). Such collection may occur by program or agency-wide at a point in time.
- Analyzing the findings is typically completed by staff.
- Reporting to the board may be via written or verbal formats.
- Per definition of 'systematic approach' - regular, consistent, not ad-hoc.

Minimum Required Documentation:

- CAA must provide at least one of the following demonstrating **all three** components of 1) collection, 2) analysis, and 3) reporting of data:
 - Customer satisfaction policy and/or procedures; **and**
 - Board reporting plan/policy; or
 - Customer satisfaction instruments such as survey forms and data collection tools.
 - If choosing this option, the documents **must** include the schedule for use of the tools.

Maximum Feasible Participation – Category 2: Community Engagement

Standard 2.1 The organization has documented or demonstrated partnerships across the community, for specifically identified purposes; partnerships include other anti poverty organizations in the area.

Maintained: Maintain on an ongoing basis, not to exceed one year from time of effective date

Guidance:

- Partnerships are considered to be mutually beneficial arrangements wherein each entity contributes and/or receives: time, effort, expertise and/or resources.
- Specifically identified purposes may include but are not limited to: shared projects; community collaborations/coalitions with an identified topic e.g. domestic violence, homelessness, teen pregnancy prevention, transportation task forces, community economic development projects, etc.; contractually coordinated services; etc.
- The Annual Report already asks for a list of partners. The intent of this standard is not to have another list, but to have documentation that shows what these partnerships entail and/or achieve.
- These could be documented through MOUs, contracts, agreements, documented outcomes, coalition membership, etc.
- This standard does not require that every partnership is a formal, fully documented relationship.

Minimum Required Documentation:

- CAA must provide at least one of the following:
 - Partnership documentation such as agreements, MOUs that support the most recent Department approved agency work plan activities; or
 - Document stating all local partners and their role (i.e., what benefits there are, what role the partner has, etc.).

NOTE: Documents must be **signed and dated**. At least one of the partnerships must be with another anti-poverty organization in the area served by the agency.

Maximum Feasible Participation – Category 2: Community Engagement

Standard 2.2 The organization utilizes information gathered from key sectors of the Community in assessing needs and resources, during the community assessment process or other times. These sectors would include at minimum: community based organizations, faith based organizations, private sector, public sector, and educational institutions.

Maintained: Every 3 years

Guidance:

- If gathered during the community assessment, it would be documented in the assessment. If done during “other times” this may be reflected in reports, data analysis, or staff/board meeting minutes.
- Engagement may include: key informant interviews, staff participation in other community groups/advisory bodies, community-wide processes, etc.
- Documentation is needed to demonstrate that all five sectors have been engaged: community-based organizations, faith-based organizations, private sector, public sector, and educational institutions.
- If one or more of these sectors are not present in the community or refuses to participate, then the CAA needs to demonstrate the gap or a good faith effort to engage the sector(s).
- Demonstrating that you have “gathered” and “used” the information may be met in a variety of ways including, but not limited to: summarizing the data in the community assessment or its appendices; documentation of phone calls, surveys interviews, focus groups in CAA files (hard copy or electronic); documentation in planning team minutes; summary reports on the data shared at board meetings or board committees; etc.

Minimum Required Documentation:

- CAA must provide the following:
 - The most recent, Community Needs Assessment document.
 - Clearly identify the key sectors page numbers at minimum of: communication based-organizations, faith-based organizations, private sector and educational institutions.

Maximum Feasible Participation – Category 2: Community Engagement

Standard 2.3 The organization communicates its activities and its results to the Community.

Maintained: Maintain on an ongoing basis, not to exceed one year from time of effective date

Guidance:

- This may be met through a CAAs annual report, social media activity, traditional news media, community outreach activities, etc.
- Community would be defined by the CAA but needs to include those outside of the staff and board of the CAA.
- To be done on a regular basis, not 'ad hoc'.

Minimum Required Documentation:

- CAA must provide at least one of the following:
 - Agency Annual report; or
 - Screen shot of current website or social media site (regularly updated) indicating results were posted to the site; or
 - Media files of stories published; or
 - News release copies; or
 - Community newsletter.

Maximum Feasible Participation – Category 2: Community Engagement

Standard 2.4 The organization documents the number of volunteers and hours mobilized in support of its activities.

Maintained: Maintain on an ongoing basis, not to exceed one year from time of effective date

Guidance:

- There is no requirement to utilize volunteers, only to document the number of volunteers and their hours, if utilized.
- This information should already be collected as part of current National Performance Indicators.

Minimum Required Documentation:

- CAA must provide at least one of the following:
 - Volunteer sign-up sheets from activities and events; or
 - Database records that track volunteers; or
 - Agendas, minutes, schedules, and logs from activities and events to document or estimate the number of hours involved; or
 - Portion of Annual Report Module 2 that documents number of volunteers and hours.

Maximum Feasible Participation – Category 3: Community Assessment

Standard 3.1 The organization conducted a community assessment and issued a report within the past 3 years.

Maintained: Every 3 years

Guidance:

- This standard refers to what is sometimes called a Community Needs Assessment, and requires that CAAs assess both needs and resources in the community. The requirement for this standard is outlined in the CSBG Act.
- The report may be electronic or print, and may be circulated as the CAA deems appropriate. This can include: websites, mail/email distribution, social media, press conference, etc.
- Please document the report release date such as April 2014 or September 2017.

Minimum Required Documentation:

- CAA must provide the following:
 - Most recent dated, full Community Needs Assessment in its entirety.

Maximum Feasible Participation – Category 3: Community Assessment

Standard 3.2 As part of the community assessment, the organization collects and includes current data specific to poverty and its prevalence related to gender, age, and race/ethnicity for their service area(s).

Maintained: Every 3 years

Guidance:

- Documentation is needed to demonstrate all four categories in order to meet the standard: gender, age, race, and ethnicity.
- Data on poverty is available from the U.S. Census Bureau.
- Agencies may use the Community Commons data tool located on the Community Action Partnership's website.

Minimum Required Documentation:

- CAA must provide the following:
 - Most recent Community Needs Assessment document.
 - Identify the portion that includes current data specific to poverty, and specifically including data points on gender, age and race/ethnicity.
 - Clearly identify the page numbers containing data demonstrating all four categories.

Maximum Feasible Participation – Category 3: Community Assessment

Standard 3.3 The organization collects and analyzes both qualitative and quantitative data on its geographic service area(s) in the community assessment.

Maintained: Every 3 years

Guidance:

- Documentation is needed to demonstrate that both types of data are collected in order to meet the Standard:
 - Qualitative: this is opinions, observations, and other descriptive information obtained from the community through surveys, focus groups, interviews, community forums, etc.
 - Quantitative: this is numeric information, e.g. Census data, program counts, demographic information, and other statistical sources.
- Documentation on data analysis is also required in order to meet the Standard.
- Take a larger Needs Assessment, pull pieces focused on community action, present to low- income communities identified.

Minimum Required Documentation:

- CAA must provide the following:
 - The most recent Community Needs Assessment document, including both qualitative and quantitative data.
 - Clearly identify the page numbers containing data demonstrating all four categories.

Maximum Feasible Participation – Category 3: Community Assessment

Standard 3.4 The community assessment includes key findings on the causes and conditions of poverty and the needs of the communities assessed.

Maintained: Every 3 years

Guidance:

- The organization may choose to include a key findings section in the assessment report and/or executive summary.
- Conditions of poverty may include items such as: numbers of homeless, free and reduced school lunch statistics, SNAP participation rates, etc.
- Causes of poverty may include items such as: lack of living wage jobs, lack of affordable housing, low education attainment rates, etc.

Minimum Required Documentation:

- CAA must provide the following:
 - Most recent Community Needs Assessment document, including the key findings section.
 - Clearly identify the page numbers containing key findings data.

Maximum Feasible Participation – Category 3: Community Assessment

Standard 3.5 The governing board formally accepts the completed community assessment.

Maintained: Every 3 years

Guidance:

- This would be met through the Board voting on a motion to accept the assessment at a regular board meeting and documenting this in the minutes.
- This vote should not be done on a consent agenda.

Minimum Required Documentation:

- CAA must provide the following:
 - Board minutes indicating the governing board reviewed and formally accepted the completed Community Needs Assessment through a vote signed by board chair or designee identified by the bylaws of the agency.
 - Clearly identify the page numbers validating the process has been carried out.

Vision and Direction – Category 4: Organizational Leadership

Standard 4.1 **The governing board has reviewed the organization’s mission statement within the past 5 years and assured that:**
1. The mission addresses poverty; and
2. The organization’s programs and services are in alignment with the mission.

Maintained: Every 5 years

Guidance:

- “Addresses poverty” does not require using the specific word poverty in the organization’s mission.
- Language such as but not limited to: low-income, self-sufficiency, economic security, etc. is acceptable.
- It is the board that determines if the programs and services are in alignment with the mission. This review and formal determination would be recorded in the board minutes.

Minimum Required Documentation:

- CAA must provide **all** of the following:
 - Dated mission statement; **and**
 - Board minutes reflecting review of the mission statement and that it addresses poverty and programs are in alignment with the mission, signed by board chair or designee identified by the bylaws of the agency.
 - Clearly identify the page numbers validating the process has been carried out.

Vision and Direction – Category 4: Organizational Leadership

Standard 4.2 The organization’s Community Action plan is outcome based, anti poverty focused, and ties directly to the community assessment.

Maintained: Maintain on an ongoing basis, not to exceed one year from time of effective date

Guidance:

- The plan needs to be focused on outcomes, i.e., changes in status (such as hunger alleviation vs. food baskets).
- The Community Action Plan (Work Plan) is sometimes referred to as the CSBG Work Plan.

Minimum Required Documentation:

- CAA must provide the following:
 - The most current, Department approved Community Action Plan (Work Plan).

Vision and Direction – Category 4: Organizational Leadership

Standard 4.3 The organization’s Community Action plan and strategic plan document the continuous use of the full Results Oriented Management and Accountability (ROMA) cycle or comparable system (assessment, planning, implementation, achievement of results, and evaluation). In addition, the organization documents having used the services of a ROMA certified trainer (or equivalent) to assist in implementation.

Maintained: Maintain on an ongoing basis, not to exceed one year from time of effective date

Guidance:

- A ROMA trainer or implementer (or equivalent) must be involved; it is up to the organization to determine the manner in which this individual is utilized. Examples include: involving the trainer in strategic planning meetings, consultation on implementation, etc.
- This includes involving a ROMA trainer/implementer (or equivalent) in the course of ROMA-cycle activities such as the community assessment, strategic planning, data and analysis, and does not need to be a separate activity.
- An agreement with ROMA certified trainer/implementer may be provided if there is no certified ROMA within the organization.
- Assist in implementation' includes using a NCRT to review the document if the agency does not have a NCRT on staff or available.
- There is no 'comparable system' for Missouri; Missouri uses ROMA

Minimum Required Documentation:

- CAA must provide at least one of the following:
 - Certification of a Certified ROMA trainer or implementer on staff; **or**
 - Documentation of an agreement with a ROMA certified trainer/implementer for consultation.

Vision and Direction – Category 4: Organizational Leadership

Standard 4.4 The governing board receives an annual update on the success of specific strategies included in the Community Action plan.

Maintained: Annually

Guidance:

- The CSBG Act requires that boards be involved with assessment, planning, implementation, and evaluation of the programs: this standard supports meeting that requirement.
- This standard is met by an update provided at a regular board meeting, and documented in the minutes.
- The update provided to the board may be written or verbal.
- The update provided to the board should include specific strategies outlined in the Community Action Plan and any progress made over the course of the last year, or by another period of time as determined by the board that is less than one year.

Minimum Required Documentation:

- CAA must provide the following:
 - Board minutes documenting updates have been provided on the Community Action Plan (Work Plan) and specific strategies (programs / initiatives) within the past 12 months.
 - Clearly identify the page numbers validating the process has been carried out.

Vision and Direction – Category 4: Organizational Leadership

Standard 4.5 The organization has a written succession plan in place for the CEO/ED, approved by the governing board, which contains procedures for covering an emergency/unplanned, short term absence of 3 months or less, as well as outlines the process for filling a permanent vacancy.

Maintained: Maintain on an ongoing basis; however, once the succession plan is in place it may be kept on file and no updates or further board action is required.

Guidance:

- Board approval would most likely occur through a board vote at a regular board meeting
- Documentation must include both elements:
 - 1) plan for emergency/unplanned absence; and
 - 2) policy for filling a permanent vacancy.

Minimum Required Documentation:

- CAA must provide **all** of the following:
 - Written succession plan/policy containing both a plan for emergency/unplanned absences and a policy for filling a permanent vacancy; **and**
 - Board meeting minutes supporting Board review and approval of the policy.
 - Clearly identify the section page numbers validating the process has been carried out.

Vision and Direction – Category 4: Organizational Leadership

Standard 4.6 An organization wide, comprehensive risk assessment has been completed within the past 2 years and reported to the governing board.

Maintained: Every 2 years

Guidance:

- Reporting to the governing board would most likely occur at a regular board meeting and should be reflected in minutes.
- It is important to note that to meet the Standard the organization only has to complete the assessment and report to the board. The results of the assessment are internal to the organization and therefore private.
- There is no one mandatory tool for completing this task. This comprehensive assessment is more than the financial risk assessment contained in the audit and may also include such areas as: insurance, transportation, facilities, staffing, property, etc. To meet the Standard, the tools(s) used needs to address organization-wide functions, not only individual program requirements.

Minimum Required Documentation:

- CAA must provide **all** of the following:
 - Most recent, dated risk assessment in its entirety; **and**
 - Board meeting minutes reflecting reporting of the risk assessment to the board.
 - Clearly identify the page numbers validating the process has been carried out.

Vision and Direction – Category 5: Board Governance

Standard 5.1	The organization’s governing board is structured in compliance with the CSBG Act: <ol style="list-style-type: none">1. At least one third democratically selected representatives of the low income community;2. One third local elected officials (or their representatives); and3. The remaining membership from major groups and interests in the community.
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Maintained: Maintain on an ongoing basis; the board member roster should be no more than 1 years old since the last revision/update.

Guidance:

- This standard is based on the CSBG Act and addresses the composition structure of the board only.
- See the CSBG Act and IM 82 for comprehensive guidance.

Minimum Required Documentation:

- CAA must provide **all** of the following:
 - Bylaws with date of last revision.; **and**
 - Board Member Roster including:
 - The names, mailing address, and email addresses for all members (including Board Officers)
 - List the Title or office of the public official serving or being represented
 - Indicate if the board members in the low-income sector are low-income or representative of low-income individuals and families in the neighborhoods served.
 - List the appropriate organization/sector (business, industry, labor, religious, law enforcement, education, or other major groups and interests), as required by the federal statute, for members in the private sector.

Vision and Direction – Category 5: Board Governance

Standard 5.2 The organization’s governing board has written procedures that document a democratic selection process for low income board members adequate to assure that they are representative of the low income community.

Maintained: Maintain on an ongoing basis, not to exceed one year from time of effective date

Guidance:

- See the CSBG Act and IM 82 for comprehensive guidance.
- See definitions list for additional clarity on democratic selection – please note that the CSBG Act requires a democratic *selection* process, not *election* process.

Minimum Required Documentation:

- CAA must provide at least one of the following:
 - Bylaws including procedure to document democratic selection; or
 - Board policy/handbook including procedure to document democratic selection.
 - Clearly identify the page numbers validating the process has been carried out.

NOTE: Links to access websites or documents **will not** be accepted as documentation.

Vision and Direction – Category 5: Board Governance

Standard 5.3 The organization’s bylaws have been reviewed by an attorney within the past 5 years.

Maintained: Every 5 years

Guidance:

- There is no requirement that the attorney be paid.
- Final reviews by attorneys on the board or on staff are **not** recommended, but are not disallowed.

Minimum Required Documentation:

- CAA must provide the following:
 - Dated attorney statement, invoice, or email indicating the review of bylaws has been completed.
 - Documentation must include date the bylaws were reviewed, as well as the last revision date of the bylaws.

Vision and Direction – Category 5: Board Governance

Standard 5.4 **The organization documents that each governing board member has received a copy of the bylaws within the past 2 years.**

Maintained: Every 2 years

Guidance:

- Distribution may be accomplished through electronic or hard copy distribution.
- Acknowledgment of receipt may be accomplished through a signed and dated written acknowledgement, email acknowledgement, board minutes documenting receipt for those in attendance, etc.

Minimum Required Documentation:

- CAA must provide at least one of the following:
 - Copies of signed and dated acknowledgements from each board member; or
 - Dated list of signatures indicating bylaws/governing documents distributed; or
 - Email read receipts from all board members indicating disbursement of bylaws/governing documents.

Vision and Direction – Category 5: Board Governance

Standard 5.5 The organization’s governing board meets in accordance with the frequency and quorum requirements and fills board vacancies as set out in its bylaws.

More Frequent than Annual /Maintained: As needed

Guidance:

- There are no requirements on the meeting frequency or quorum; only that organizations abide by their approved bylaws.

Minimum Required Documentation:

- CAA must provide **all** of the following:
 - Board attendance sheet for the past 12 months; **and**
 - Bylaws; **and**
 - Board roster; **and**
 - Board minutes, clearly identify the page numbers verifying quorum.

Vision and Direction – Category 5: Board Governance

Standard 5.6 Each governing board member has signed a conflict of interest policy within the past 2 years.

Maintained: Every 2 years

Guidance:

- There is no requirement to use a specific conflict of interest policy, only that the organization utilizes one that meets its needs.
- The signed conflict of interest policies are collected, reviewed, and stored by the organization.
- 2 CFR Part 200 (Super Circular) is in effect for any grant periods after December 26, 2014 and has additional information on conflict of interest policies and specific disclosures.

Minimum Required Documentation:

- CAA must provide the following:
 - Signed conflict of interest forms for all board members.
 - Signed forms are to be no more than 2 years old.

Vision and Direction – Category 5: Board Governance

Standard 5.7 **The organization has a process to provide a structured orientation for governing board members within 6 months of being seated.**

More Frequent than Annual /Maintained: As needed

Guidance:

- There is no specific curricula requirement, or training methodology required; Board Orientation should have many organization-specific elements. These may include review of the bylaws, overview of programs, and review of fiscal reports.
- Training may be delivered at board meetings, special sessions, in person, through electronic media, or through other means as determined by the board.
- The organization must have documentation of its process (including content), as well as signed documentation that each board member has been provided orientation.
- Process must be in writing.

Minimum Required Documentation:

- CAA must provide **all** of the following:
 - Written process/policy to provide structured orientation to the board; **and**
 - Orientation training materials, curriculum, agenda; **and**
 - Board member acknowledgement/signature documents or dated list of signatures verifying that each member has been provided with orientation.

Vision and Direction – Category 5: Board Governance

Standard 5.8 Governing board members have been provided with training on their duties and responsibilities within the past 2 years.

Maintained: Every 2 years

Guidance:

- Training may be delivered at board meetings, special sessions, conferences, through electronic media, or other modalities as determined by the board.
- The organization needs to have documentation that the training occurred (including content) as well as documentation that each board member has been provided with training opportunities.

Minimum Required Documentation:

- CAA must provide **all** of the following:
 - Documentation that the training occurred (including agenda and content) for at least one training within the past 2 years; **and**
 - Documentation that each board member has been provided with training.
 - This can include sign in sheets or a dated list of signatures verifying that training on duties and responsibilities has been provided.

Vision and Direction – Category 5: Board Governance

Standard 5.9 **The organization’s governing board receives programmatic reports at each regular board meeting.**

More Frequent than Annual /Maintained: As needed

Guidance:

- This standard does not require a report on each program at every board meeting; however it does call for some level of programmatic reporting at every board meeting. Organizations determine their own process to report programs to the board. For example, some organizations may cycle through their programs semi-annually, others may do so on a quarterly basis, and yet others may do a brief summary at every board meeting.
- Board minutes should reflect that programmatic reports have been received.
- Programmatic reporting may be in writing and/or verbal.

Minimum Required Documentation:

- CAA must provide **all** of the following:
 - Board minutes for all regularly held board meetings within the past 12 months that include a section on program updates; **and**
 - Board materials/packets/agendas indicating what types of program reports provided.
 - Clearly identify the page numbers validating the reporting process has been carried out.

Vision and Direction – Category 6: Strategic Planning

Standard 6.1 **The organization has an agency wide strategic plan in place that has been approved by the governing board within the past 5 years.**

Maintained: Every 5 years

Guidance:

- This is intended to be an organization-wide document, not a list of individual program goals
- This would be met through the Board voting on a motion to accept the strategic plan at a regular board meeting and documenting this in the minutes.

Minimum Required Documentation:

- CAA must provide **all** of the following:
 - The most recent, approved and dated strategic plan; **and**
 - Board/advisory body minutes reflecting review **and** approval of the strategic plan.
 - Clearly identify the page numbers validating the process has been carried out.

Vision and Direction – Category 6: Strategic Planning

Standard 6.2 **The approved strategic plan addresses reduction of poverty, revitalization of low income communities, and/or empowerment of people with low incomes to become more self sufficient.**

Maintained: Every 5 years

Guidance:

- These are the purposes of CSBG as laid out in the Act.
- These specific terms are not required, but the plan needs to include one or more of the themes noted in the Standard.

Minimum Required Documentation:

- CAA must provide the following:
 - The most recent, approved and dated strategic plan that includes the elements of addressing the reduction of poverty, revitalization of low-income communities, and/or empowerment of people with low incomes to become more self-sufficient.
 - Clearly identify the page numbers for the specified elements.

Vision and Direction – Category 6: Strategic Planning

Standard 6.3 The approved strategic plan contains family, agency, and/or community goals.

Maintained: Every 5 years

Guidance:

- These goals are set out as part of ROMA, referenced in IM 49, and provide the framework for the National Performance Indicators (NPI's).
- These specific terms are not required, but the plan must address one or more of these dimensions.

Minimum Required Documentation:

- CAA must provide the following:
 - The most recent, approved and dated strategic plan that includes family, agency, and/or community goals.
 - Clearly identify the page numbers for the specific elements.

Vision and Direction – Category 6: Strategic Planning

Standard 6.4 Customer satisfaction data and customer input, collected as part of the community assessment, is included in the strategic planning process.

Maintained: Every 5 years

Guidance:

- This standard links the community assessment with strategic planning.
- There is no requirement to do additional data collection.
- The standard may be documented by references to the analysis of customer satisfaction data and input within the plan, or by including the analysis of customer satisfaction data in the plan or its appendices, with a brief explanation of how it was used.

Minimum Required Documentation:

- CAA must provide the following:
 - The most recent, approved and dated strategic plan that includes the customer satisfaction data and customer input, collected as part of the community assessment.
 - Clearly identify the page numbers for the specific elements.

Vision and Direction – Category 6: Strategic Planning

Standard 6.5 **The governing board has received an update(s) on progress meeting the goals of the strategic plan within the past 12 months.**

Maintained: Annually

Guidance:

- The CSBG Act requires that Boards be involved with assessment, planning, implementation, and evaluation of programs; this standard supports meeting that requirement.
- This standard would be met by an update being provided at a regular board meeting, or a planning session, and documented in the minutes.
- The update provided to the board may be written or verbal.
- The update provided to the board should include goals outlined in the strategic plan and any progress made over the course of the last year, or by another period of time as determined by the board that is less than one year.

Minimum Required Documentation:

- CAA must provide the following:
 - Board minutes reflecting updates of progress in meeting the goals of the strategic plan provided to the board.
 - Clearly identify the page numbers validating the process has been carried out.

Operations and Accountability – Category 7: Human Resource Management

Standard 7.1 The organization has written personnel policies that have been reviewed by an attorney and approved by the governing board within the past 5 years.

Maintained: Every 5 years

Guidance:

- There is no requirement that the attorney be paid, but should be a currently practicing attorney.
- Final reviews by attorneys on the board or on staff are **not** recommended, but are not disallowed.
- Note that the review needs to have occurred at some point during in the past five calendar years.
- Agencies may work with human resource professionals and others (attorneys on staff or on the board) prior to the legal review to minimize cost.
- Note that not all attorneys are familiar with Human Resource issues and agencies are encouraged to use attorneys with this type of expertise.

Minimum Required Documentation:

- CAA must provide **all** of the following:
 - Personnel policies with the most recent revision date noted; **and**
 - Board minutes (dated within the past 5 years) reflecting approval by the board to accept the personnel policies.
 - Clearly identify the pages numbers validating the process has been carried out; **and**
 - Dated statement, invoice or email from an attorney reflecting the review was completed.

NOTE: Links to access websites or documents **will not** be accepted as documentation.

Operations and Accountability – Category 7: Human Resource Management

Standard 7.2 **The organization makes available the employee handbook (or personnel policies in cases without a handbook) to all staff and notifies staff of any changes.**

More Frequent than Annual /Maintained: As needed

Guidance:

- The Handbook may be made available in electronic (such as an agency intranet, a location on a shared server, or distributed via email) or print formats.
- The process for notification of changes is up to the individual organization.
- Agencies are encouraged to have staff sign off that they have received and read the Employee Handbook.

Minimum Required Documentation:

- CAA must provide the following:
 - Documentation that the handbook/personnel policy was made available to employees.
 - Documentation may include organization wide email notifications, current signed acceptance form, etc.

Operations and Accountability – Category 7: Human Resource Management

Standard 7.3 The organization has written job descriptions for all positions, which have been updated within the past 5 years.

Maintained: Every 5 years

Guidance:

- This references job descriptions for each type of position, not each staff person.
- To meet the Standard, job descriptions must include date of last review/update; the Standard does not require changes when descriptions are reviewed.
- The time frame is defined as within the past 5 calendaryears.

Minimum Required Documentation:

- CAA must provide **all** of the following:
 - Job descriptions for all position types within the organization (organized by divisions of the organization).
 - All descriptions must be dated/updated within the last 5 years; **and**
 - Agency Wide Organizational Chart listing all positions or staff list with role and titles.
- NOTE:** Links to access websites or documents **will not** be accepted as documentation.

Operations and Accountability – Category 7: Human Resource Management

Standard 7.4 **The governing board conducts a performance appraisal of the CEO/executive director within each calendar year.**

Maintained: Annually

Guidance:

- There is no specific appraisal tool required to be used.
- This may be accomplished through a committee or the full board.
- The approval of the performance appraisal is often done in conjunction with setting the CEO compensation.

Minimum Required Documentation:

- CAA must provide at least one of the following:
 - Most recent completed evaluation tool used in the performance appraisal of the CEO/executive director;
 - Dated and signed within the current calendar year by authorized agent of the board; or
 - Board minutes, reflecting board members reviewed the actual evaluation, with a motion and vote regarding the performance appraisal within the current calendar year.

Operations and Accountability – Category 7: Human Resource Management

Standard 7.5 The governing board reviews and approves CEO/executive director compensation within every calendar year.

Maintained: Annually

Guidance:

- The full board should review and approve the total compensation at a regular board meeting and have it reflected in the board minutes.
- This includes salary, fringe, health and dental insurance, expense/travel account, vehicle, etc.
- As a point of reference, the 990 asks: Did the process for determining compensation of the following persons include a review and approval by independent persons, comparability data, and contemporaneous substantiation of the deliberation and decision? (Section B, Policies, question 15 of Form 990).
- The compensation review and approval often happens in conjunction with the CEO performance appraisal.

Minimum Required Documentation:

- CAA must provide the following:
 - Board minutes, reflecting board members reviewed the actual compensation package, with a motion and vote regarding compensation for the CEO/executive director within the current calendar year.; **or**
 - The CEO/executive director contract or compensation package signed by the CEO/executive director and the by authorized agent of the board within the current calendar year; **and**
 - Board approved, agency policy on setting the ED/CEO compensation.

Operations and Accountability – Category 7: Human Resource Management

Standard 7.6 The organization has a policy in place for regular written evaluation of employees by their supervisors.

Maintained: Maintain on an ongoing basis

Guidance:

- The Standard calls for a policy being in place.
It is recognized that it is best practice to have annual reviews for every employee

Minimum Acceptable Documentation:

- CAA must provide the following:
 - Evaluation policy, procedure and tool for employee evaluation (likely found in personnel policies and procedures).

NOTE: Links to access websites or documents **will not** be accepted as documentation.

Operations and Accountability – Category 7: Human Resource Management

Standard 7.7 The organization has a whistleblower policy that has been approved by the governing board.

Maintained: Maintain on an ongoing basis, however, once the policy is in place it may be kept on file and no updates or further board action is required.

Guidance:

- Once the whistleblower policy is approved and in place, there is no requirement for additional review under this standard. It is good practice for boards to periodically review their whistleblower policy to ensure that they are operating in compliance with it.
- This would be met through a vote by the board at a regular meeting and noted in the minutes.
- Many organizations incorporate their whistleblower policy into their Personnel Policies or Employee Handbook. If not included, the Whistleblower policy should be made available to staff via other means.
- Timeframe not stated; general policy, no more than 5-8 years old

Minimum Required Documentation:

- CAA must provide **all** of the following:
 - Whistleblower policy; **and**
 - Board minutes reflecting approval of the policy.
 - Clearly identifying the page number validating the process has been carried out.

NOTE: Links to access websites or documents **will not be accepted as documentation.**

Operations and Accountability – Category 7: Human Resource Management

Standard 7.8 All staff participate in a new employee orientation within 60 days of hire.

More Frequent than Annual /Maintained: As needed

Guidance:

- There are not curricula requirements for the orientation; it is up to the organization to determine the content. Some examples of content include time and effort reporting, ROMA, data collection, mission, history of Community Action, etc.
- This may be met through individual or group orientations, and documented in personnel files.
- The date of hire is considered to be the first day the employee works at the organization.
- Must show policy AND that it was carried out by agency.

Minimum Required Documentation:

- CAA must provide both of the following:
 - New employee orientation policy/process; **and**
 - Dated and completed orientation sign in roster/sheet, email showing receipt of orientation materials, or signed document receipt list, or similar documentation occurring within the current calendar year.

Operations and Accountability – Category 7: Human Resource Management

Standard 7.9 **The organization conducts or makes available staff development/training (including ROMA) on an ongoing basis.**

More Frequent than Annual /Maintained: As needed

Guidance:

- There are no specific requirements for training topics, with the exception of ROMA. This standard may be met through in-house, community-based, conference, online, and other training modalities.
- Agencies may conduct their own training in-house, or may make online or outside training available to staff.
- This should be documented in personnel files.
- Ongoing means **regularly scheduled by policy or through annual program planning**, not ad-hoc.

Minimum Required Documentation:

- CAA must provide **all** the following for **at least one** training held within the last 12 months:
 - Agenda; **and**
 - Completed sign in sheets (or registration, confirmation, receipt information if offsite event/conference); **and**
 - Training Materials.

Operations and Accountability – Category 8: Financial Operations and Oversight

Standard 8.1 The organization’s annual audit (or audited financial statements) is completed by a Certified Public Accountant on time in accordance with Title 2 of the Code of Federal Regulations, Uniform Administration Requirements, Cost Principles, and Audit Requirement (if applicable) and/or State audit threshold requirements.

Maintained: Annually

Guidance:

- Please see and follow state and federal guidance related to audits.
- Completed by a Certified Public Accountant on time in accordance with Single Audit Guidelines.
- Audit in this context means the annual audit of the CAA’s financial statements as required by OMB Uniform Guidance.
- CAA must provide the following to the Federal Audit Clearinghouse by the due date as required by 2 CFR 200.512:
 - All required element of the Data Collection Form (SF-SAC)
 - Audit Reporting Package, which includes the following:
 - Financial Statements and Schedule of Expenditure of Federal Awards
 - Summary Schedule of Prior Audit Findings
 - Auditor’s Reports and
 - Corrective Action Plan on audit findings.

Minimum Required Documentation:

- CAA must provide the following:
 - The automated email from the Federal Audit Clearinghouse verifying that the Single Audit has been processed.
- DSS will obtain the CAA’s audited financial statements from the FAC.

Operations and Accountability – Category 8: Financial Operations and Oversight

Standard 8.2 All findings from the prior year’s annual audit have been assessed by the organization and addressed where the governing board has deemed it appropriate.

Maintained: Annually

Guidance:

- This standard can be met through board discussion and decisions at a regular board meeting with decisions noted in the minutes.
- Findings are those noted in the Audit itself, not the Management Letter.
- Audit in this context means the annual audit (or annual audited financial statements) required by the OMB Uniform Guidance and related state and federal guidelines. It does not include findings from programmatic monitoring reports.
- Each year’s audit includes a section on the status of the audit findings from the previous year. When the audit is presented to the Board, the Board should assess with executive management the current status of those findings.

Minimum Required Documentation:

- CAA must provide **all** of the following:
 - Board minutes reflecting review of the prior audit findings signed by the Board Chair or designee identified by the bylaws of the agency.

Operations and Accountability – Category 8: Financial Operations and Oversight

Standard 8.3 The organization’s auditor presents the audit to the governing board.

Maintained: Annually

Guidance:

- The presentation to the board should be reflected in the Minutes.
- This standard can be met via the auditor meeting with the full board or appropriate committee including Finance, Finance/Audit, Audit, or Executive. If done via committee, a report to the full board by the Committee Chair to confirm the meeting occurred needs to be completed and documented in the minutes.
- The Auditor may make the presentation in person or via web or conference call. In addition, ensure that the bylaws allow for electronic communication if the auditor or their representative presents in this way.
- The presentation may be made by a representative(s) of the audit firm and is not required to be the Partner of the firm engaged in the audit.

Minimum Required Documentation:

- CAA must provide the following:
 - Board minutes signed by the Board Chair or designee identified by the bylaws of the agency, reflecting presentation to the board by either
 - the auditor or if the auditor presented the audit to a separate committee, or
 - Chairman of the Committee to which the audit was presented.

Operations and Accountability – Category 8: Financial Operations and Oversight

Standard 8.4 The governing board formally receives and accepts the audit.

Maintained: Annually

Guidance:

- This standard can be met through a board discussion of the audit at a regular board meeting and reflected in the minutes.
- Each board member should be provided a copy of the audit, either in hard or electronic format, with this distribution noted in the board minutes.

Minimum Required Documentation:

- CAA must provide the following:
 - Board minutes signed by the Board Chair or designee identified by the bylaws of the agency, reflecting acceptance of audit by the board.

Operations and Accountability – Category 8: Financial Operations and Oversight

Standard 8.5 The organization has solicited bids for its audit within the past 5 years.

Maintained: Every 5 years

Guidance:

- The Standard does not require that an organization switch auditors or partners, only that the audit is put out to bid within the past 5 years.
- If an organization is currently under contract with a firm that has been conducting the audit for 5 or more years at the time of the first Standards assessment, the bid process needs to occur as soon as the current contract is completed.

Minimum Required Documentation:

- CAA must provide the following:
 - In the year that the audit was bid, documentation of bid process, including RFP/RFQ, list of vendors receiving notice, proof of any publication of the process dated within the last 5 years.
 - In the interim years, documentation of the date the audit was last bid.

Operations and Accountability – Category 8: Financial Operations and Oversight

Standard 8.6 **The IRS Form 990 is completed annually and made available to the governing board for review.**

Maintained: Annually

Guidance:

- The IRS Form 990 is a publically available document, and specifically asks if the board has reviewed the document prior to its submission (Section B. Policies, Question 11a of Form 990). It also asks for a description of the review process.
- The Standard would be met by documenting the review process in the board minutes; the Standard does not require board acceptance or approval of the IRS Form 990.
- The IRS Form 990 can be made available by sharing a copy electronically or in hard copy to governing board members with the process noted in the minutes.
- The IRS Form 990 should be completed and submitted on time to the IRS within any granted extension periods.

Minimum Required Documentation:

- CAA must provide both of the following:
 - Completed IRS Form 990; **and**
 - Documentation of the Form 990 distribution to the board (mail, email, link) and minutes documenting the review process.
 - Clearly identify the page numbers validating the process has been carried out.

Operations and Accountability – Category 8: Financial Operations and Oversight

Standard 8.7 **The governing board receives financial reports at each regular meeting that include the following:**

- 1. Organization wide report on revenue and expenditures that compares budget to actual, categorized by program; and**
- 2. Balance sheet/statement of financial position.**

More Frequent than Annual /Maintained: As needed

Guidance:

- Categorization by program does not require reporting by individual funding stream; it may be by organization-defined program areas, e.g., Early Childhood, Energy, Housing, etc.
- This does not limit the financial information a board receives at each board meeting. Individual agencies are likely to determine that additional information is needed by the board and should determine what specific information needs to be shared with the board beyond that included in the Standard.

Minimum Required Documentation:

- CAA must **provide all of the following for at least two tripartite board meetings** within the last 12 months:
 - Copies of financial reports provided; **and**
 - Approved board minutes/committee minutes reflecting review of financial reports; **and**
 - Board meeting packet/agenda.
 - Clearly identify the page numbers validating the process has been carried out.

Operations and Accountability – Category 8: Financial Operations and Oversight

Standard 8.8 All required filings and payments related to payroll withholdings are completed on time.

More Frequent than Annual /Maintained: As needed

Guidance:

- This includes: federal, state, and local taxes; as well as insurance and retirement payments.
- Documentation may include information received from a payroll service if used or the organization's financial management system. Such verification could be reviewed at the committee level if the organization determines it necessary, or delegated to the Executive Director.

Minimum Required Documentation:

- CAA must provide the following:
 - Bank Statements and General Ledger for the current year showing payroll tax, insurance and retirement payments have been made or
 - CPA or Payroll service certification that the filings have been completed.

Operations and Accountability – Category 8: Financial Operations and Oversight

Standard 8.9 The governing board annually approves an organization wide budget.

Maintained: Annually

Guidance:

- This would be met through approval at a regular board meeting and documented in the board minutes.
- This is intended to complement, not replace, program budgets.
- It is recognized that each grant or program will likely have an annual budget that may cross two organization fiscal years.
- It is important to note that an organization-wide budget is a forecast for the upcoming organization fiscal year, based on the best information at the time of development. It provides the board with an overview of what the expected revenues and expenditures are likely to be over the course of a year, with the knowledge that the actual revenue and expenditures may differ. There is no requirement for the organization to pass a modified organization-wide budget during the course of a year as things change.

Minimum Required Documentation:

- CAA must provide **all** of the following:
 - The annual budget presented to the board of directors for the current fiscal year; **and**
 - Board minutes reflecting approval of agency-wide budget, signed by Board Chair or designee identified by the bylaws of the agency.

Operations and Accountability – Category 8: Financial Operations and Oversight

Standard 8.10 **The fiscal policies have been reviewed by staff within the past 2 years, updated as necessary, with changes approved by the governing board.**

Maintained: Every 2 years and as needed

Guidance:

- This would be met through approval at a regular board meeting and documented in the board minutes.
- The staff level review of the fiscal policies may be made at a fiscal committee meeting with the committee minutes reflecting the review.
- Fiscal policies must be compliant with OMB regulations.
- **Staff is defined as the Chief Financial Officer, Executive Director, and/or executive management.**

Minimum Required Documentation:

- CAA must provide **all** of the following:
 - Fiscal policies manual with most recent revision date noted; **and**
 - Dated form certifying fiscal/executive staff review (dated within the past two years); **and**
 - Board minutes documenting review and approval of any changes, or if no changes within the past two years, a signed statement from executive management or board chair indicating no changes.

Operations and Accountability – Category 8: Financial Operations and Oversight

Standard 8.11 A written procurement policy is in place and has been reviewed by the governing board within the past 5 years.

Maintained: Every 5 years

Guidance:

- This would be met through approval at a regular board meeting and documented in the board minutes.
- The procurement policy may be found in an organization’s fiscal policies; it does not need to be a separate document.
- The procurement policy must be compliant with CSBG and OMB federal regulations.

Minimum Required Documentation:

- CAA must provide **all** of the following:
 - Procurement policy; **and**
 - Board minutes reflecting review by the board of the policy (must be completed within the past 5 years).

Operations and Accountability – Category 8: Financial Operations and Oversight

Standard 8.12 **The organization documents how it allocates shared costs through an indirect cost rate or through a written cost allocation plan.**

Maintained: Maintain on an ongoing basis, not to exceed one year from time of effective date

Guidance:

- If no approved indirect cost rate is in place, the organization must have a written cost allocation plan.
- If the CAA has one, the Federally Negotiated Indirect Cost Rate should be currently approved.

Minimum Required Documentation:

- CAA must provide the following:
 - Cost allocation plan or letter from the Federal agency approving the provisional or final indirect cost rate.

Operations and Accountability – Category 8: Financial Operations and Oversight

Standard 8.13 The organization has a written policy in place for record retention and destruction.

Maintained: Maintain on an ongoing basis, not to exceed one year from time of effective date

Guidance:

- This includes the retention and destruction of both electronic and physical documents.
- This Policy may be a stand-alone policy or may be part of a larger set of organization policies.
- As a point of reference, the 990 asks: Did the organization have a written document retention and destruction policy?

Minimum Required Documentation:

- CAA must provide the following:
 - Document/Record Retention and Destruction policy.

Operations and Accountability – Category 9: Data and Analysis

Standard 9.1 The organization has a system or systems in place to track and report client demographics and services customers receive.

Maintained: Maintain on an ongoing basis, not to exceed one year from time of effective date

Guidance:

- The organization shall utilize the Missouri Information System (MIS) to track required agency wide demographic and services customers receive as part of the CSBG Annual Report.
- This standard calls for a system to be in place at the local agency level. The system shall consist of a written program and policy manual outlining procedures for administration and delivery of CSBG programs and services.

Minimum Required Documentation:

- CAA must provide the following::
 - CSBG Program and Policy Manual outlining procedures for administration and delivery of CSBG programs and services.
 - Clearly identify the page numbers for the specific element(s).

Operations and Accountability – Category 9: Data and Analysis

Standard 9.2 The organization has a system or systems in place to track family, agency, and/or community outcomes.

Maintained: Maintain on an ongoing basis, not to exceed one year from time of effective date

Guidance:

- The organization shall utilize the Missouri Information System (MIS) to track required outcome information used for the CSBG Annual Report.
- This standard calls for a system to be in place at the local agency level. The system shall consist of a written program and policy manual outlining procedures for administration and delivery of CSBG programs and services.

Minimum Required Documentation:

- CAA must provide at least one of the following:
 - CSBG Program and Policy Manual outlining procedures for the tracking of family, agency and/or community outcomes.
 - Clearly identify the page numbers for the specific element(s).

Operations and Accountability – Category 9: Data and Analysis

Standard 9.3 The organization has presented to the governing board for review or action, at least within the past 12 months, an analysis of the agency's outcomes and any operational or strategic program adjustments and improvements identified as necessary.

Maintained: Annually

Guidance:

- This standard would be met through board or staff discussions as long as the analysis and discussion are documented.
- It is important to note that an organization is likely to have multiple programs with varying program years. This standard addresses an annual review of organization outcomes. Organizations are likely to make operations and strategic program adjustments throughout the year, making a single point in time analysis less effective than ongoing performance management.
- Organizations can meet this standard by having an annual board discussion of organization outcomes, multiple conversations over the course of the year, or other process the organization deems appropriate as long as these discussions are reflected in the minutes, with any operational or program adjustments or improvements being noted.
- Organizations are not required to make adjustments in order to meet the standard, only to have conducted an analysis and a board decision was made to either modify or not modify
- Present your Annual Report to the board annually after you complete it; get their input.

Minimum Required Documentation:

- CAA must provide the following:
 - Meeting minutes from Board meetings within the past 12 months, where the analysis, reports and outcomes were presented.
 - Clearly identify the page numbers where discussion of the analysis are documented.

Operations and Accountability – Category 9: Data and Analysis

Standard 9.4 **The organization submits its CSBG Annual Report data reflecting client demographics and organization wide outcomes.**

Maintained: Annually

Guidance:

- See submission deadlines provided in the most recent Key Dates document.
- The CSBG Annual Report already requires the reporting of client demographics and organization-wide outcomes. This standard does not require additional data collection or reporting.

Minimum Required Documentation:

- CAA must provide the following:
 - CSBG Annual Report data contained in the MIS Module 4 A, B & C Reports

Missouri Specific Grant Reporting Requirements – Category 10: Expectations

Standard 10.1 **The organization submits electronic quarterly progress reports by the 15th of the month following the end of the quarter: January, April, July and October.**

Maintained: Maintain on an ongoing basis

Guidance:

- Please refer to the most recent Key Dates document.
- Quarterly reports shall be submitted electronically using the form and format specified by the Department.
- Quarterly reports shall identify activities completed, in progress and/or planned; as well as any obstacles encountered and strategies to resolve them; consistent with those identified in the previously submitted and Department approved Work Plan.

Minimum Required Documentation:

- CAA must provide **all** of the following:
 - All progress reports, submitted timely as indicated in the most recent Key Dates document.

Missouri Specific Grant Reporting Requirements – Category 10: Expectations

Standard 10.2 The organization submits electronic board meeting notices, meeting agendas, and all other information to the board (board packets) at least three (3) business days prior to the scheduled board meeting.

Maintained: Maintain on an ongoing basis

Guidance:

- All board information is to be uploaded at least three (3) business days prior to the scheduled board meeting.

Minimum Required Documentation:

- CAA must provide **all** of the following:
 - Board meeting notices; **and**
 - Meeting agendas; **and**
 - All information provided to the board (board packets).

Missouri Specific Grant Reporting Requirements – Category 10: Expectations

Standard 10.3 The organization submits approved meeting minutes, signed and dated by the board chair or designee identified by the bylaws of the agency no later than thirty (30) days after approval.

Maintained: Maintain on an ongoing basis

Guidance:

- Many of the Organizational Standards are met with information captured in the Board Meeting Minutes. This standard does not require additional data collection or reporting.

Minimum Required Documentation:

- CAA must provide **all** of the following:
 - All approved meeting minutes, signed and dated by the board chair or designee identified by the bylaws of the agency no later than thirty (30) days after approval.

Missouri Specific Grant Reporting Requirements – Community Action Plan (Work Plan)

CAP

Community Action Plan (Work Plan)

Maintained: Maintain on an ongoing basis

Guidance:

- See submission deadlines provided in the most recent Key Dates documents.
- The organization shall not be provided funding until the Community Action Plan (Work Plan) has received final, written approval by the Department.
- The organization shall not implement proposed changes to the Community Action Plan (Work Plan) without prior written consent from the Department.
- In the event the Department approves the organizations request to modify the Community Action Plan (Work Plan), a formal amendment to the contract may be required.

Minimum Required Documentation:

- CAA must provide:
 - The most current, Department approved Community Action Plan(s) (Work Plan(s)).