



Title: Organizational Standards Implementation Guidance Memorandum 2015-1

Purpose: To provide guidance, expectations and implementation strategies for the Center of Excellence developed Organizational Standards for Community Services Block Grant (CSBG) Eligible Entities.

Effective Date: November 20, 2015

Related (No Related GM)

Resources:

U.S. Department of Health and Human Services ACF/OCS Division of State Assistance Information Memorandum Transmittal Number 138
Center of Excellence Developed Organizational Standards (Private and Public)
Center of Excellence Developed Organizational Standards Glossary of Terms
Center of Excellence Developed Organizational Standards Self-Assessment (Private and Public)
Center of Excellence Developed Organizational Standards Calendar of Actions (Agencies and Boards)
North Carolina Community Services Block Grant Model State Plan 10/01/15-09/30/16

Background

On January 26, 2015 U.S. Department of Health and Human Services ACF/OCS Division of State Assistance issued Information Memorandum Transmittal Number 138 for the purpose of providing guidance on State and Federal roles and responsibilities for organizational standards as a component of the performance management and accountability system for the Community Services Block Grant (CSBG). This GM will provide foundational information needed to promote the full adoption and implementation of the Center of Excellence Developed Organizational Standards (Private and Public) and will serve as a point of departure for future relative Guidance Memoranda upon assessment of lessons learned.

State Guidance and Interpretation

1. The Office of Economic Opportunity (OEO) as North Carolina's CSBG Lead Agency will assess all CSBG Eligible Entities against the Organizational Standards each year as a component of the state's Risk Assessment process. Meeting the requirements of the organizational standards are intended to strengthen agencies' capacity for delivering services to low-income families; however, meeting the standards alone does not ensure overall CSBG compliance. Compliance with the organizational standards will become a part of OEO's remote and onsite monitoring but will in no way replace monitoring efforts relative to all applicable state, federal and contract compliance rules.
2. Each CSBG Eligible Entity will be responsible for submitting to OEO by May 20, 2016 a Board approved Organizational Standards Implementation Plan that at a minimum includes the following elements:

- ✚ The agency's process and tools used to conduct and prepare the Community Needs Assessment, Organization-Wide Risk Assessment and Strategic Plan. (Standards 1.2, 2.2, 3.1, 3.2, 3.3, 3.4, 4.3, 4.5, and 6.1)
 - ✚ The agency's process and tools for providing and documenting orientation to Board Members, Board Member Communications and Board Actions. (Standard 5.7)
 - ✚ The agency's process and tools for providing and documenting staff development/training (inclusive of Results Oriented Management and Accountability), Employee Handbook and/or Personnel Policies and Procedures and Employee Evaluations inclusive of the CEO/ED. (Standards 7.2, 7.4, 7.6, 7.8 and 7.9)
 - ✚ The agency's process and tools for collecting and analyzing information directly from low-income individuals including Customer Satisfaction Data. (Standard 1.3)
 - ✚ The agency's process for retaining an Auditor, sharing the Audit results with Board and Staff members and Board acceptance of the Audit. (Standards 8.1, 8.3, 8.4, and 8.5)
 - ✚ The agency's Calendar of Required Organizational Standards Actions/Events.
 - ✚ The agency's repository for documenting and retaining Organizational Standards related information. (OEO encourages electronic retention methods.)
3. Each agency will document the continuous use of the full ROMA Cycle and utilization of a ROMA-certified Trainer to assist in implementation of the Community Action and Strategic Plans (Standard 4.3) through participation in OEO/NCCAA sponsored or approved ROMA Training inclusive of but not limited to conference participation, workshops, webinars, ROMA-certified agency staff and/or NC's NPtP Network of ROMA-certified Trainers. {Training certificates will be provided by OEO and/or the NCCAA and will indicate what Organizational Standards are covered.}
 4. Each agency will electronically submit updates to their original Organizational Standards Self-Assessment inclusive of the supporting documentation for OEO review, determination of met/not met and feedback not later than May 20, 2016.
 5. The percentage of Organizational Standards met will be scored as follows on the CSBG Eligible Entities Risk Assessment:
 - a. 85-100% (1 point = Low Risk)
 - b. 69-84% (5 points = Medium Risk)
 - c. 68% or below (10 points = High Risk)

Understanding the State's Monitoring Protocol

There will be three levels of addressing non-compliance to include meeting the organizational standards. A finding is defined as any area of non-compliance with federal or state rules, contractual requirements, agency bylaws/policies/procedures, or binding source document (such as Information Memorandum or Guidance Memorandum).

- 1) All monitoring reports issued which identify findings will require submission of standardized Corrective Action Worksheets (CAW). CAWs identify the finding and its cause, required actions for correction, responsible parties and date by which action will be completed. Upon OEO acceptance of specified actions and submission of evidence the actions have been taken, OEO reviews documents and/or conducts a follow-up visit to confirm implementation of actions and issues a formal response indicating that additional action is needed or that the finding is closed and no additional action is necessary. While the Board may have a role in the corrective action process, completion of the CAW is handled at the Executive Director level.

- 2) All findings require corrective action; however, all findings do not result in Quality Improvement Plans (QIPs). QIPs will be initiated when an eligible entity's level of non-compliance could result in suspension of funding and/or threat of de-designation as a result of repeat findings, fraud, waste, abuse, lack of capacity to safeguard resources, inability to demonstrate outcomes achievement or failure to meet contract requirements. QIPs will accompany a formal notice to the agency of areas of non-compliance/findings, causes and required actions to be taken to correct the deficiencies, responsible parties and the date by which the action must be completed. Similar to CAWs, QIPs will require OEO acceptance prior to implementation and OEO review to determine if the agency has successfully addressed the deficiencies thereby removing the threat of suspension of funding and/or de-designation. QIPs will require Board and Executive Level Staff engagement and acknowledgement along with a minimum of monthly technical assistance contact by phone, email, document submission/reporting and/or onsite visits. Failure to address QIP deficiencies will prompt the State to follow IM 116.
- 3) OEO will initiate use of Technical Assistance Plans (TAPs) as deemed appropriate to assist agencies moving forward in meeting organizational standards and/or addressing deficiencies/findings. TAPs may be offered independent or concurrently with the notification of CAWs and/or QIPs. OEO views TAPs as the first option when deemed appropriate and will be used to document training and technical assistance required in an effort to reduce the need for QIPs. Similar to CAWs, TAPs will require OEO acceptance prior to implementation and OEO review to determine if the identified deficiency has been addressed.

Opportunities for Information Sharing, Training and Technical Assistance

Dear Executive Director Emails
Quarterly Leadership Webinar/Conference Calls
Website Updates
Organizational Standards Webinars/Listening Sessions/Peer Learning Opportunities
OEO Contractors' Training Conference
NCCAA Annual Conference
Frequently Asked Questions
List Serve
Organizational Standards Repository

This GM will be accessible on the OEO website and will be sourced during OEO's ongoing monitoring, training and technical assistance activities. All sub-grantee agencies will be accountable to this information.


Office of Economic Opportunity Administrator

11/20/15
Date