



New York State Community Action Association
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Legislative Hearing

Proposed State Application and Plan for the Community Services Block Grant (CSBG) Program for FFY 2024 and FFY 2025

September 17, 2024

**Submitted by Jacqueline Orr, Chief Executive Officer,
New York State Community Action Association, Inc.**

Introduction

My name is Jacqueline Orr, and I am the CEO of the New York State Community Action Association (NYSCAA). Thank you for this opportunity to provide feedback on the Department of State, Division of Community Services 2024 & 2025 CSBG State Application and Plan and the work of Community Action Agencies (CAA) across the state.

NYSCAA is a non-profit membership organization representing the 47 Community Action Agencies (CAAs) serving all 62 counties in the State. As the Community Action Association, NYSCAA receives CSBG discretionary funds directly through the Department of State/Division of Community Services (DOS/DCS) to support training and technical assistance for the Community Action network. These funds enable NYSCAA to facilitate training, information sharing, peer mentoring, leadership development, and collaborative initiatives within the network.

Since its founding in 1984, NYSCAA has provided training, technical assistance, statewide coordination, communication, and professional development to CAA staff. The association's regional and statewide professional development events, along with agency-specific T/TA activities, address key topics identified by both the CAAs and DOS/DCS as areas of need. NYSCAA has also expanded capacity-building opportunities for the network, including the formation of Communities of Practice and peer-led groups.

Additionally, NYSCAA develops and disseminates a wide range of resource materials, such as the annual Poverty Report, the Community Action Resource Guide, the Annual Report, and monthly newsletters, all of which highlight the strength and impact of the network.

Since 2011, NYSCAA has been designated as the lead agency in the federal Region II Regional Performance and Innovation Consortium (RPIC), a project of the US Department of Health and Human Services, to coordinate technical assistance and training (T/TA), support best practices and enhance capacity and innovation in the CAAs and state associations in New York, New Jersey, Puerto Rico, and the US Virgin Islands.

We want to recognize DOS/DCS's support and advocacy for Community Action. We look forward to working with Secretary of State Walter Mosley. We appreciate Zoila Del Castillo, the Deputy Secretary of State for Economic Opportunity, and Director Manuel (Manny) Rosa and his staff, who have consistently exhibited their support and dedication to the CAAs, working with them individually to understand the services and programs established to meet the needs of vulnerable families in every local community.

The Value of CSBG Funding

The Community Services Block Grant (CSBG) is a cornerstone of support for Community Action Agencies (CAAs) across the State, empowering them to deliver vital services and programs that foster

self-sufficiency for individuals and families with low income. Through this essential funding, CAAs address both the immediate needs and the underlying causes of poverty, ensuring that their efforts lead to sustainable outcomes and stronger communities.

Supporting Self-Sufficiency

CSBG funding enables CAAs to provide a comprehensive range of services aimed at helping individuals and families overcome barriers to economic stability. These services include job training and employment assistance, financial literacy programs, housing support, and access to health care and nutrition services, among others. By offering a coordinated, holistic approach to working with families, CAAs help participants gain the skills and resources they need to achieve long-term self-sufficiency.

For example, employment assistance programs supported by CSBG provide job seekers with not only resume-building and interview preparation but also access to skills training and certifications. These opportunities open doors to higher-paying, stable employment, significantly increasing the likelihood of economic independence.

Addressing the Causes of Poverty

CSBG funding also allows CAAs to address the root causes of poverty, ensuring that communities can break the cycle of economic hardship. This is done through initiatives that tackle issues such as affordable housing shortages, educational disparities, health inequities, and systemic barriers to employment. By addressing these foundational issues, CAAs create pathways to opportunity for individuals who might otherwise remain trapped in poverty.

One powerful example of how CSBG funding addresses the root causes of poverty is through providing resources such as financial counseling, eviction prevention, and rental assistance. By

stabilizing housing situations, CAAs reduce the risk of homelessness and housing insecurity, which are major barriers to economic stability and self-sufficiency.

Community Impact

The effectiveness of CSBG funding goes beyond individual success stories; it strengthens entire communities. When individuals and families with low-income gain economic stability, their success leads to increased local economic activity, improved social cohesion, and reduced reliance on emergency services. In addition, CAAs work collaboratively with local governments, businesses, and other nonprofit organizations to maximize resources and ensure that the community as a whole benefits from the programs they offer.

In rural and urban areas alike, CSBG funding supports essential services like energy assistance, senior programs, and food security initiatives. Without this funding, many vulnerable populations would face insurmountable challenges, and the communities themselves would suffer from the long-term economic and social effects of widespread poverty.

Essential Resource

CSBG funding is indispensable for Community Action Agencies across the State. It empowers them to deliver services that not only address the immediate needs of families with low-income but also provide the tools and opportunities necessary for long-term self-sufficiency. By addressing both the causes and conditions of poverty, CAAs create lasting change in communities, fostering a brighter and more equitable future for all.

This continued investment in the fight against poverty is a sound economic strategy, as it strengthens the fabric of society, lifts individuals and families, and ultimately creates more resilient and prosperous communities.

2024-2025 CSBG Management Plan

NYSCAA offers the following comments for consideration related directly to the 2024-2025 State Plan, developed in the winter and spring of 2023.

Section 3: State Plan Development and Statewide Goals

Plan Development. The network values the collaborative approach to developing the CSBG state plan. DOS/DCS engaged the CAA network early in the process, allowing for meaningful input into its development rather than limiting participation to feedback on a finalized draft. In partnership with NYSCAA, a workgroup of CAA representatives met regularly to review and provide recommendations for the 2024-25 plan. The network strongly encourages continuing this inclusive model for future state plan development and review.

Within the State's Goals, **Goal 5 notes that "DOS will continue to implement a pilot database-driven solution aimed at streamlining administrative documents and processes to reduce redundancies for CSBG State staff and CSBG eligible entities."** While the network appreciates the state's intention to reduce paperwork and administrative redundancies for CAAs, there remains uncertainty about the state's next steps regarding a database solution. The pilot concluded without a clear plan moving forward. Since CAAs will ultimately be the end users, it would be logical for the state to engage with them directly to gather insights on current processes and databases. This would help determine the most effective and efficient solution for the entire network.

Section 7: State Use of Funds:

Distribution of Funds. DOS/DCS has been late releasing funds to the Community Action Agencies after receiving the disbursement from the federal Department of Health and Human Services (HHS). CSBG funding is regarded as foundational for CAAs. When the state fails to expedite

the distribution of these funds, it places an undue burden on the agencies, often forcing them to rely on lines of credit. Such delays in fund disbursement can lead to financial hardship for the CAAs.

Use of Discretionary Funds. NYSCAA recommends that DOS/DCS establish a formal process for determining the allocation of discretionary funds. DOS/DCS should engage the CSBG Advisory Council and the Community Action Network to gather input on community needs, ensuring that discretionary dollars are directed toward priority areas, innovative pilot programs, and expanding best practices and evidence-based initiatives.

Furthermore, NYSCAA is pleased that the state allocates discretionary funds to help Community Action Agencies address compliance requirements and meet Organizational Standards. These funds support improvements in fiscal management and oversight, strengthen board governance, enhance overall agency capacity to mitigate risk, and improve infrastructure for service delivery. This capacity-building funding is crucial for agencies that require additional assistance to achieve these goals.

As discretionary grants are awarded to organizations outside the CAA network, NYSCAA requests that these grantees be held to the same standards as CAAs. This should include ensuring that funded projects are based on needs identified through a Community Needs Assessment, are outcome-driven, and incorporate a mechanism for input from individuals with low-income. Additionally, in any out-of-network RFA process, we recommend that DOS/DCS implement a rating system that awards points to Community Action Agencies for meeting both the national CSBG Organizational Standards and specific NYS Standards.

Section 8: State Training and Technical Assistance

The statewide network of CAAs places great value on ongoing training and technical assistance (T/TA). NYSCAA is pleased to have received CSBG discretionary T/TA funding for many

years and is also included in the 2024-2025 state plan. NYSCAA values its positive and productive partnership with DOS/DCS, which has lasting benefits for the network. Through this partnership, the association provides the CAA network with timely and relevant training and technical assistance based on identified needs. We encourage DOS to continue supporting NYSCAA's wide range of training, technical assistance, and statewide coordination and communication to strengthen the network. The state and NYSCAA have worked closely together to address T/TA needs individually, through monitoring, and collectively through statewide training.

Section 9: State Linkages and Communication

NYSCAA encourages DOS to develop deeper linkages and partnerships with other state agencies. One of the key responsibilities of a CSBG State Office, as outlined in the CSBG Accountability Measures, is to establish and maintain linkages within state government to ensure the effective delivery of services to individuals with low income and communities. The 2024-2025 state plan notes the Division of Community Services is part of the Workforce Innovation and Opportunity Act (WIOA) Interagency Team. The association recommends that DOS share the progress and outcomes of this group's efforts with the broader network.

DOS must continue to develop and maintain partnerships with other state agencies such as the Office of Mental Health (OMH), Office of Children and Family Services (OCFS), Office of Temporary and Disability Assistance (OTDA), the Council on Children and Families (CCF), and the Head Start Collaboration office. Partnerships with these state offices could considerably advance the State's commitment to statewide initiatives such as Fatherhood and Trauma-Informed Care and ensure that the well-established CSBG network is considered a part of any new state initiatives focusing on factors related to poverty in NY. NYSCAA would be pleased to work with DOS to develop, maintain, and grow state-level partnerships and linkages.

Section 10: Monitoring, Corrective Action, and Fiscal Controls

State Triennial Assessment Review (STAR). DOS/DCS and NYSCAA created a workgroup in 2022 to review and discuss DOS/DCS' current monitoring framework and practices, which provided a valuable opportunity to discuss monitoring holistically.

DOS/DCS is in the process of developing the State Triennial Assessment Review (STAR), which will replace the Triennial Review for Accountability for Compliance with Standards (TRACS). To date, more than a year later, neither the monitoring workgroup members nor the network has seen a draft of the STAR and, therefore, has been unable to offer feedback. It has taken an inordinate amount of time for DOS/DCS to develop the tool and share it with the network.

NYSCAA supports the effort DOS/DCS is making to reduce redundancies and the number of monitoring visits to CAAs while increasing technical assistance. The revised monitoring approach maintains consistent monitoring and oversight of Community Action Agencies while also providing more extensive support to Community Action Agencies where additional guidance and technical assistance from DOS is necessary.

Section 12: Individual and Community Income Eligibility Requirements

NYSCAA strongly supports the language proposed in item 12.1a: "If federal legislative action permits a state to adopt a percentage of poverty higher than 125% then DOS shall select the highest percentage of poverty permissible as a criterion for eligibility." The network welcomes DOS/DCS' commitment to allow local CAAs to serve the broadest population possible, subject to legislative requirements.

Additional Comments

Implementation of the Governor's **Minority and Women-owned Business Enterprise (MWBE) initiative**, which NYSCAA and its member agencies support, continues to be challenging for CAAs.

Particularly in upstate communities where the MWBE requirements make it difficult to find local vendors, agencies are frequently forced to purchase services outside of their communities and forgo using local vendors, which have been long-term supporters of the agencies. Therefore, we recommend looking at the requirements around engaging MWBE vendors to streamline the process.

We recommend that the **CSBG Advisory Council conduct a semi-annual review of the CSBG state plan** to ensure the network is meeting the processes and goals outlined in the plan. Additionally, the association and network encourage DOS/DCS to make greater use of the Advisory Council to fulfill its role, which includes “to advise the Secretary of State on strategies and activities to achieve these goals by either responding to actions proposed by the Secretary or suggesting new initiatives to the Secretary.”

Over the past two years, the Council has been unable to carry out its purpose due to a lack of members' attendance, which has been a source of frustration. We urge DOS/DCS to fill vacancies promptly so the Council can function as intended and fully support the network.

Legislative Hearing Date

Lastly, the network was notified on August 29, giving less than three weeks' notice before the scheduled hearing. This short time frame poses significant challenges for securing in-person testimony from CAAs across the state. Additionally, the hearing coincides with the annual statewide Community Action Conference, which will affect in-person participation. We hope the next hearing is not scheduled during the annual state-wide conference.

We look forward to supporting the network's collaboration with DOS/DCS and developing a partnership based on mutual respect, trust, and transparency that will benefit the Community Action Network in NY.

Thank you again for the opportunity to offer our comments and recommendations today.

A handwritten signature in blue ink, appearing to read "Jacqueline Orr". The signature is written in a cursive style with a prominent initial "J".

Jacqueline Orr
CEO