



Information Memorandum

**U.S. Department of Health and Human Services
Administration for Children and Families
Office of Community Services
Division of State Assistance
370 L'Enfant Promenade, S.W.
Washington, D.C. 20447**

Transmittal No. 94

Date: January 13, 2006

To: State CSBG Lead Agencies, State Community Action Associations
From: Director of State Assistance , Office of Community Services
Subject: Fiscal Year 2006 Head Start Triennial and Follow-Up Reviews in Community Action Agencies – Immediate and Long-Term Opportunities

Background: As you know, the two Federal agencies that administer the CSBG and Head Start – the Office of Community Services (OCS) and the Head Start Bureau -- have been working over the past several years to improve program integrity, effectiveness, and accountability of their respective programs. OCS has sought to strengthen program monitoring and oversight through its block grant relationship with States. The Head Start Bureau has implemented significant changes in monitoring to improve upon many aspects of the monitoring process. These changes are detailed in the FY 06 PRISM GUIDE available at www2.acf.dhhs.gov/programs/hsb/.

Sixty-percent of Community Action Agencies administer Head Start programs and serve as the grantees for over five hundred Head Start programs throughout the country. Community Action Agencies operate approximately 30% of all federally funded Head Start programs. OCS and the HSB recognize and reaffirm the intentional historic pairing of community action and Head Start because of their common purpose, shared families, and complimentary outcomes. It also recognizes that Head Start is often the largest program within Community Action Agencies and that the continued viability of the agency as a whole may ultimately be reflected in the integrity and soundness of its administration of Head Start.

One result of the collaboration between community action and Head Start has been improved communication among Federal, regional, State, and local officials involved in program oversight and continuous improvement. Also sharing of relevant Head Start monitoring results and other pertinent information can better inform and influence the types of technical assistance needed to support program improvement as well as identify high quality Community Action Agencies that can serve as models or mentors for other community action agencies.

Distribution of the list of community action agencies scheduled for Head Start triennial, first year or follow-up program reviews in Fiscal Year 2006 provides an opportunity for State CSBG Lead Agencies and State Community Action Associations to reinforce the importance that Community Action Agencies have ongoing systems that enable the agency to comply with Head Start administrative, fiscal, and Head Start Program Performance Standards..

In addition, it provides yet another opportunity to help improve community action agency compliance with program coordination requirements and expectations described in Section 672 of the Community Services Block Grant Act:

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

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

Recommendations for Immediate Action

Fiscal Year 2006 Triennial or First Year Reviews

At a minimum, OCS urges State CSBG Lead Agencies and State Community Action Associations to work collaboratively with local community action agencies scheduled for a Head Start triennial or first year review in Fiscal Year 2006 to:

Review Assessment of Key Agency Policies, Procedures and Practices

State CSBG Lead Agencies and/or State community action associations should encourage local agencies with Head Start programs to conduct their annual Head Start self assessments and ensure that the community assessment contains updated and accurate information, and that agency Head Start programs have ongoing systems of oversight and monitoring. The tripartite boards and executive staff of local community action agencies should also be encouraged to remain knowledgeable and involved in Head Start program assessment, monitoring, and improvement. The processes – self assessment, community assessment and ongoing monitoring provide opportunities for agencies to identify Head Start program strengths and areas that warrant improvement. Agencies in the past have often focused their energies on “preparing for the monitoring test” instead of implementing ongoing systems that identify areas needing improvement and that sustain the actions taken to correct weaknesses.

Through local agency implementation of an annual Head Start self assessment, community assessment and ongoing monitoring, agency tripartite boards and community action executive staff will be able to assess the current status of key agency-wide or Head Start-specific administrative and program policies, procedures, and practices, including but not limited to:

- Coordination and responsible governance among agency tripartite boards, Head Start Policy Councils and advisory committee(s);
- Recruitment, enrollment, and eligibility of Head Start program participants;
- Agency-wide or Head Start-specific financial status, management and accountability policies and procedures, including those related to establishing and maintaining fund accounts, disbursements, records, reports, and audits;
- Staffing procedures and requirements, including recruitment, hiring, composition, qualifications and certification, training, retention and/or dismissal;
- Appropriateness and completeness of program services to eligible children and families;
- Facility requirements – health and safety;
- Information collection and reporting – service reporting and accountability/evaluation reports for child and family outcomes;
- Relationship of Head Start programs and services to other programs and services administered by the agency and/or other service providers in the community. For example, is Head Start part of an agency-wide strategy or strategic plan to reduce poverty or promote self-sufficiency?

Grantee Review Identification and Resolution of Issues

If potential compliance or program performance issues are identified in the assessments described above, OCS recommends that State CSBG Lead Agencies and State community action associations encourage and help where possible local agency executive directors and Head Start program directors resolve those issues within a reasonable time frame so that the corrective actions can be sustained over time. It is important to stress that quick fixes to identified problems typically result in a reoccurrence of the problems. Most areas needing improvement are often linked to major systems that often require thoughtful planning and time to implement needed changes. An agency's ongoing planning should include corrective action or improvement plans as needed. Agencies that assume a proactive role in addressing their identified weaknesses through a thoughtful corrective or program improvement plan will be better positioned to sustained quality services.

It is important to keep in mind that Federal Head Start monitoring is done on a triennial schedule. Due to rapid changes within communities today including natural disasters, agencies that do not conduct rigorous ongoing monitoring may find that the federal monitoring team uncovers a serious weakness or deficiency that should have been discovered by the agency.

Longer-Term Opportunities and Strategies

Beyond the immediate and targeted support to community action agencies scheduled for Head Start reviews during this fiscal year, the Community Services Network must continue to focus its efforts on strengthening overall agency governance and administration, fiscal control, program effectiveness and accountability to assure capacity to comply with all program requirements of the various programs administered by the agency.

The continued presence of Head Start among programs administered by community action agencies, and all the benefits to low-income people that can be derived from that association, will depend upon the resolve of Federal, regional, and State officials of both programs to ensure that agencies are held accountable to meet all applicable regulations

and that each entity with oversight authority does its best to carry out its oversight responsibilities in an objective and timely manner. Cooperation and coordination among Head Start and community action administrators and informed and active governing boards at the local level are also key factors to positive outcomes.

Strategic Planning and Program Coordination

OCS encourages State CSBG Lead Agencies and State Community Action Associations to continue to provide ongoing training and technical assistance to local agencies that focuses on improving strategic planning and coordination among all programs and services they administer, particularly Head Start. Agencies that choose to operate each of their programs separately without a coordinated strategy to address the multi-faceted causes and conditions of poverty among low-income people and communities are meeting neither the letter nor spirit of the CSBG Act. And, these agencies are much less likely to be helping low-income people out of poverty.

Program Administration and Financial Management

Ongoing training and technical assistance is needed to assure that local community action agencies have the capacity to administer multiple programs in ways that comport with the fiscal and administrative requirements of each program. Central administration and financial management of various Federal, State, local, and privately-funded programs is a unique hallmark of community action and a powerful rationale for its preservation. It is not easy to operate many programs with varying requirements but we do it well in most places. We need to do it well everywhere.

OCS has created and supported national training and technical assistance resources that focus on agency administration and financial management. These resources continue to be available to State and local community action agencies. OCS encourages State CSBG Lead

Agencies and State Community Action Associations to utilize these resources.

Tripartite Board Training and Empowerment

Community Action tripartite boards are responsible for overseeing the operation of the entire agency and all its programs, including Head Start. In order to help safeguard the integrity of community action agencies, tripartite boards must have the capacity to carry out their oversight responsibilities and need training and technical assistance to, at a minimum, assess, approve, and monitor:

- Annual and long-range agency strategic plans;
- Agency administrative policies and procedures for all programs;
- Agency financial management policies, procedures, and practices for all programs;
- Agency program design and performance;
- Agency relationships with other organizations in the community; and
- Agency compliance with applicable Federal, State, and local program requirements.

OCS recommends that State CSBG Lead Agencies and State Community Action Associations help local agencies coordinate the work of agency-wide tripartite boards with the governing or advisory boards and committees of other programs administered by the agency, particularly Head Start. Both community action and Head Start require strong parent/client participation in local program governance and oversight. Shared membership or joint meetings of the community action agency tripartite board and the Head Start Policy Council may strengthen assessment of family and community needs, help achieve consensus on an overall agency response to those needs, provide for closer and more effective oversight of agency administration and financial controls, and improve programs and outcomes for clients of all programs administered by the agency.

One Agency, One Mission

Finally, the most effective way to ensure sustained health among all of the programs that comprise community action, especially CSBG and Head Start, is an understanding that community action is one agency with one mission – to reduce poverty among low-income people and improve opportunities for their success in their communities. To be effective, all staff, all programs, all board members, and all community partners need to work in unison toward this common mission and goal. Community Action Agencies with multiple programs throughout the country have moved to reaffirm their singular antipoverty purpose and identity. State CSBG Lead Agencies and State Community Action Associations are encouraged to support and reinforce this Network-wide transformation with training and technical assistance, and by achieving similar congruity of purpose and action across programs at the State level.

Margaret J. Washnitzer, DSW
Director of State Assistance
Office of Community Services