

State Guidance – Oregon  
Organizational Standards for Private Community Action Agencies

Category 1: Consumer Input and Involvement		Required Documentation	Examples	Criteria Details
1.1	The organization demonstrates low-income individuals' participation in its activities.	At a minimum, one example showing participation in agency activities from low-income participants. This includes activities such as board service, volunteering and focus groups.	<ul style="list-style-type: none"> <li>• Survey Participation</li> <li>• Board Membership</li> <li>• Forums and Focus Group attendee information</li> </ul>	Board service may only qualify for this standard if a low-income person is serving. A representative from a low-income-serving agency does not qualify and submitted documentation must show this distinction, or it will not be accepted as proof. Other examples of participation would be advisory bodies, participating in surveys for assessments or focus groups, etc.
1.2	The organization analyzes information collected directly from low-income individuals as part of the community assessment.	This Standard has been merged with Standard 3.3.	See Standard 3.3	See Standard 3.3.
1.3	The organization has a systematic approach to collecting, analyzing, and reporting customer satisfaction data to the governing board.	Agencies must submit documentation showing that there is a process in place, the results have been analyzed and the findings have been shared annually with the board.	<ul style="list-style-type: none"> <li>• Procedure Document</li> <li>• Data Instrument</li> <li>• Analysis Report or Board Report</li> <li>• Board Minutes</li> </ul>	All 3 requirements must be shown in the submitted documentation. The design of the systematic approach is up to the agency. However, the process must occur annually, at a minimum, and the schedule should be noted in the procedure document.
Category 2: Community Engagement		Required Documentation	Examples	Criteria Details
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.	This information is collected via the CSBG Annual Report and the MGA CSBG Community Action Plan.		This Standard is not in the software as documentation is collected elsewhere.
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 a minimum: community-based organizations, the private sector, and educational institutions.	Qualifying agencies must submit documentation showing that information has been collected from all of the minimum sectors. Agencies must also show that the information collected is used in, at minimum, one agency planning process. Planning document examples include, but are not limited to: community assessments, program development or program analysis, strategic planning, board discussions and annual reports.	<ul style="list-style-type: none"> <li>• Meeting Minutes</li> <li>• Analysis Document</li> <li>• Survey / Forum Documents</li> <li>• Needs Assessment</li> <li>• Appendix or Methodology description notation</li> </ul>	Agencies must show the information has been collected and utilized. Information for all three minimum sectors collected does not have to occur in the same document or activity. In this instance, 'qualifying' refers to agencies with an annual budget of \$15 million or above (For ACCESS, CAPECO, CAT, CCNO, CCSDD, CINA, KLCAS, MCCAC, ORCCA, YCAP, and OHDC this standard is optional).

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2.3	The organization communicates its activities and its results to the community.	Agencies must submit, at a minimum, one example of communicating outcomes and, at a minimum, two examples of communicating activities.	<ul style="list-style-type: none"> <li>• Press releases</li> <li>• Social Media screenshots</li> <li>• Annual report</li> <li>• Outcomes Report</li> </ul>	Agency documentation must show the information was externally publicized. Internal documents and reports do not qualify.
2.4	The organization documents the number of volunteers and hours mobilized in support of its activities.	This information is collected via the CSBG Annual Report.		This Standard is not in the software as documentation is collected elsewhere.
<b>Category 3: Community Assessment</b>		<b>Required Documentation</b>	<b>Examples</b>	<b>Criteria Details</b>
3.1	The organization conducted a community needs assessment and issued a report within the past three years.	Community Needs Assessment	<ul style="list-style-type: none"> <li>• Community Needs Assessment</li> <li>• Press release</li> <li>• Email distribution documentation</li> <li>• Website posting</li> </ul>	Submitted Community Needs Assessments must be dated to qualify for review. Issuing the report is defined by finalizing, approving and sharing. Sharing may be limited to inter-agency; however, the agency must provide documentation that shows the agency staff has access to the document. This can be shown through: copy of the email distribution, a screenshot of posting on the website, etc. In the case of external sharing, a press release, email distribution to partners, screenshot of public website posting, social media posting, etc., are acceptable.
3.2	As part of the community needs 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).	Agency's assessments must include information about poverty in relation to all required demographics: gender, age, race/ethnicity.	<ul style="list-style-type: none"> <li>• Poverty Data</li> <li>• Citation</li> <li>• Service Area Data</li> </ul>	It is not acceptable to show only the demographics of the service area. The data must show the poverty levels of those demographics. Preferred formatting is charts and graphs.
3.3	The organization collects and analyzes both qualitative and quantitative data on its geographic service area(s) in the community assessment, <b>including data collected from low-income community members.</b>	Agency's assessments must include both quantitative and qualitative data, including information collected from low-income community members. Agencies must submit both the assessment and documentation showing information was collected from low-income community members.	<ul style="list-style-type: none"> <li>• Methodology Doc</li> <li>• Copies of Raw Data</li> <li>• Analysis Meeting Minutes or Methodology</li> <li>• Needs Assessment and list of data by service area</li> <li>• Copies of Raw Data</li> </ul>	If the information collected is not referenced explicitly in the body, methodology or appendix of the assessment, agencies may be asked to submit additional documentation to show that both types of data were collected and included information collected from low-income community members. Blank information-collecting instruments, such as surveys, will not be considered adequate documentation for this purpose.

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3.4	The community assessment includes key findings on the causes and conditions of poverty and the needs of the communities assessed.	Community Needs Assessment and Key Findings section or Summary	<ul style="list-style-type: none"> <li>• Key Findings Section in Assessment</li> <li>• Documentation and discussion in summary</li> </ul>	Community Needs Assessments must include a clearly labeled section or summary that meets the intent of this standard.
3.5	The governing body formally accepts the completed community assessment.	Documentation must be submitted that shows the board approved the final draft of the agency's assessment.	<ul style="list-style-type: none"> <li>• Board Minutes</li> </ul>	Board minutes must indicate a vote and approval. Board minutes referencing discussions about the assessment, but not the approval of final draft, will not be accepted.
<b>Category 4: Organizational Leadership</b>		<b>Required Documentation</b>	<b>Examples</b>	<b>Criteria Details</b>
4.1	The governing board has reviewed the organization's mission statement within the past 5 years and assured that: 1. The program mission addresses poverty; and 2. The organization's programs and services are in alignment with the mission.	Agencies must submit documentation showing that the mission statement has been reviewed and approved if changes were made.	<ul style="list-style-type: none"> <li>• Board Minutes</li> </ul>	Documentation must include board minutes. Board minutes must reflect discussion that indicates a review. The review should address mission statement's reflection on agency's services and priorities.
4.2	The organization's Community Action Plan is outcome-based, anti-poverty focused, and ties directly to the community assessment.	This information is collected during the MGA process.		This Standard is not in the software as documentation is collected elsewhere.
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 (or equivalent) to assist in implementation.	Agencies must submit a completed ROMA Documentation Form and show that staff who have had ROMA training are part of the process.	<ul style="list-style-type: none"> <li>• ROMA Documentation Form</li> <li>• Statement from certified staff</li> </ul>	Agencies should use the tool developed for this standard. The tool should show that an Implementer, or staff trained in ROMA, has participated in the planning process. In lieu of this tool, the ROMA-trained or certified staff could submit a statement detailing their involvement in processes and planning.
4.4	The governing board receives an annual update on the success of specific strategies included in the Community Action Plan.	Agencies should submit dated board minutes and related materials (agenda, handouts) to show this standard has been met.	<ul style="list-style-type: none"> <li>• Board Minutes</li> <li>• Board Packet: Materials</li> <li>• Update/Analysis Report</li> </ul>	Documentation must show that an update and discussion occurred with the board. Distribution-only of the plan, without discussion of the strategies, will not qualify to show this standard has been met.

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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.	Agencies must submit a copy of their most recent Succession Plan that has been approved by their board.	<ul style="list-style-type: none"> <li>• Succession Plan</li> <li>• Board Minutes</li> </ul>	A submitted succession plan must address all components: short-term absence, long-term absence, and the process for filling a permanent vacancy. Dated board minutes must show approval of the plan.
4.6	An organization-wide, comprehensive risk assessment has been completed within the past 2 years and reported to the governing board.	Agencies must submit evidence of the risk assessment completion and documentation that the results have been shared with their board.	<ul style="list-style-type: none"> <li>• Risk Assessment Report</li> <li>• Board Minutes</li> </ul>	A proper agency risk assessment must be submitted. An insurance form does not equal a risk assessment. Agencies only have to show they have shared the results with the board – they do not have to show they have responded or implemented any actions.
<b>Category 5: Board Governance</b>		<b>Required Documentation</b>	<b>Examples</b>	<b>Criteria Details</b>
5.1	The Organization's governing board is structured in compliance with the CSBG Act by either: 1. At least one-third democratically selected representatives of the low-income community; One-third local elected officials (or their representatives); the remaining membership from major groups and interests in the community. 2. Selecting the board through another mechanism specified by the State to assure decision-making and participation by low-income individuals in the development, planning, implementation, and evaluation of programs.	Agencies must submit a tripartite board roster for their governing board (or advisory board) that meets all components.	<ul style="list-style-type: none"> <li>• Bylaws</li> <li>• Board Roster</li> </ul>	Agencies bylaws must include a tripartite requirement for board structure. Submitted rosters should clearly show the tripartite structure. Low-income positions on the board should not primarily be made of representatives from low-income serving agencies. If an agencies' board is comprised of all representatives in the low-income section, an agency will be required to adopt a TAP to remedy this.
5.2	The Organization's governing board has written procedures that document a democratic selection process for low-income board members adequate to ensure that they are representative of the low-income community.	Agencies must submit a written procedure that documents their democratic selection process.	<ul style="list-style-type: none"> <li>• The written procedure from the board manual</li> </ul>	Only a written procedure from board manual will be accepted for this standard. A summary description of the process in the bylaws will not qualify. This procedure must reflect a true democratic selection process that ensures actual low-income representation on the board.
5.3	The Organization's bylaws have been reviewed by an attorney within the past 5 years.	Agencies must submit documentation that shows their bylaws have been reviewed by an attorney in the required timeframe.	<ul style="list-style-type: none"> <li>• Board Minutes</li> <li>• Law Firm Invoice</li> </ul>	As its important discussion has occurred, an agency should submit both examples of documentation.
5.4	The Organization documents that each governing board member has received a copy of the bylaws within the past 2 years.	Agencies must submit documentation that shows the most current bylaws have been distributed to their board.	<ul style="list-style-type: none"> <li>• Signed Bylaws Receipt</li> <li>• Board Minutes</li> <li>• Meeting Materials</li> <li>• Email distribution documentation</li> </ul>	While a discussion does not need to have occurred, clear evidence of (at minimum) the distribution of the most current bylaws must be present in submitted documentation.

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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.	Agencies must submit documentation that shows their meeting requirements, as well as examples of meeting the requirements.	<ul style="list-style-type: none"> <li>• Bylaws</li> <li>• Board Calendar</li> <li>• Board Minutes</li> </ul>	The reviewer will be looking at minutes and schedule to determine if this is met. Agencies should indicate quorum in their minutes to facilitate this as well as have clear information about the schedule and quorum requirements in their bylaws.
5.6	Each governing board member has signed a conflict of interest policy within the past 2 years.	Agencies must submit their policy and evidence that each board member has signed the form within the required timeframe.	<ul style="list-style-type: none"> <li>• Conflict of Interest Policy</li> <li>• Signed Form</li> </ul>	The simple mention of the distribution of the form in board meeting minutes will not suffice.
5.7	The Organization has a process to provide a structured orientation for governing board members within 6 months of being seated.	Agencies submit documentation of the process of orientation and provide an example of implementation.	<ul style="list-style-type: none"> <li>• Orientation materials</li> <li>• Board Minutes</li> <li>• Dated Orientation Receipt Form</li> </ul>	The content of orientation is not being reviewed; agency must show there is a documented process for the orientation. Implementation: this can be shown through a combination of notice of acceptance to the board, the orientation process from board manual and a dated receipt.
5.8	Governing board members have been provided with training on their duties and responsibilities within the past 2 years.	Agencies should submit, at minimum, (1) example of board members receiving training on their duties and responsibilities if the example is Board 101 training, or at minimum (2) examples if the training being submitted is regarding new initiatives and other types of specialized training.	<ul style="list-style-type: none"> <li>• Board Minutes</li> <li>• Training Tracker</li> </ul>	In this case, training on responsibilities is not limited to board members receiving board 101 - responsibilities can include refresher course, updates, and information on new initiatives, etc. However, the agency should submit at minimum (2) examples to illustrate this as meeting the standard.
5.9	The Organization's governing board receives programmatic reports at each regular board meeting.	Agencies should submit documentation that shows the board receives programmatic reports consistently.	<ul style="list-style-type: none"> <li>• Board Minutes</li> <li>• Program Reports</li> </ul>	Consistently, in this case, is defined as regularly, not, for example, once a year during a strategic planning session. The intent of this standard is that the board is engaged and knowledgeable about the programming. Therefore, two conditions should be shown: received regularly and space for discussion. If reports are distributed but are not part of the agenda, the threshold for meeting the standard will not be met.
<b>Category 6: Strategic Planning</b>		<b>Required Documentation</b>	<b>• Examples</b>	<b>Criteria Details</b>
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.	Agencies must submit approved strategic plan.	<ul style="list-style-type: none"> <li>• Strategic Plan</li> <li>• Board Minutes</li> </ul>	Board minutes must indicate a vote of approval for the current strategic plan within the last 5 years. Strategic Plan should be a fully-realized plan. A stand-alone list of agency goals will not qualify for this standard.
6.2	The approved strategic plan addresses the reduction of poverty, revitalization of low-income communities, and/or empowerment of people with low incomes to become more self-sufficient.	Agencies must submit an approved strategic plan that addresses at least (1) of these categories.	<ul style="list-style-type: none"> <li>• Strategic Plan</li> </ul>	One of these criteria must be listed. An internally-focused strategic plan that does not contain at least (1) of these categories will not qualify the plan for this standard.

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<b>6.3</b>	The approved strategic plan contains family, agency, and/or community goals.	Agencies must submit an approved strategic plan that addresses at least (1) of these categories.	<ul style="list-style-type: none"> <li>• Strategic Plan</li> </ul>	One of these criteria must be listed. While an internally-focused strategic plan with only agency goals would qualify, it is in danger of not meeting 6.2, if (1) category from 6.2 is not listed.
<b>6.4</b>	Customer satisfaction data and customer input, collected as part of the community assessment, is included in the strategic planning process.	Agencies must submit documentation that shows the agency collected, analyzed and included customer satisfaction data into the strategic planning process.	<ul style="list-style-type: none"> <li>• Strategic Plan</li> <li>• Collected Data</li> <li>• Customer Input Survey or Collection Instrument</li> </ul>	In order for submitted documentation to qualify as proof, there must be direct, easily found linkages between data collected and inclusion in the strategic plan. The reviewer will be looking for items such as meeting minutes where data is discussed, collection tools, methodology notes, inclusion in the document appendix, etc.
<b>6.5</b>	The governing board has received an update(s) on progress meeting the goals of the strategic plan within the past 12 months.	Agencies must submit documentation that shows the board received an update on strategic plan goals progress within the previous 12 months.	<ul style="list-style-type: none"> <li>• Board Minutes</li> <li>• Report or Goal Progress Summary</li> </ul>	Documentation should show a progress report was given. However, if progress reports are given at board minutes throughout the year, in phases, this will also be acceptable as long as documented in the submitted board minutes. If this is the case, agencies should submit 2-3 months of board minutes to reflect this.
<b>Category 7: Human Resource Management</b>		<b>Required Documentation</b>	<b>Examples</b>	<b>Criteria Details</b>
<b>7.1</b>	The Organization has written personnel policies that have been reviewed by an attorney and approved by the governing board within the past 5 years.	Agencies should submit documentation that shows an attorney review has occurred within 5 years and that the results of the review (the changes) have been approved by the board.	<ul style="list-style-type: none"> <li>• Personnel Manual</li> <li>• Board Minutes</li> </ul>	In cases where an attorney is on the board and they are part of the review, the submitted documentation must clearly reflect that they were reviewing as an attorney.
<b>7.2</b>	The Organization makes available the employee handbook (or personnel policies in cases without a handbook) to all staff and notifies staff of any changes.	Agencies must submit evidence that the employee handbook is available and staff is notified of changes.	<ul style="list-style-type: none"> <li>• Employee Handbook</li> <li>• Proof of notice of changes</li> </ul>	Available in this instance is defined as being kept in an area where it is accessible. This can be on the server (screenshot), on the website (screenshot). Notifications of changes can be shown through a staff notice via email. Simply showing a screenshot of a revised document does not suffice for notice.
<b>7.3</b>	The Organization has written job descriptions for all positions, which have been updated within the past 5 years.	Agencies should submit documentation that shows the practice of reviewing job descriptions exists within their agency.	<ul style="list-style-type: none"> <li>• Dated job descriptions</li> <li>• HR Policy</li> </ul>	In this instance, agencies may submit a sampling of job descriptions to show the practice occurs. Sampling is defined here as 3-5. Submitted samples must contain revision dates to qualify as proof of meeting this standard. Agencies may also submit HR Policy; however, proof of implementation must also be submitted.

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7.4	The governing board conducts a performance appraisal of the CEO/Executive Director within each calendar year.	Agencies should submit documentation that shows the appraisal has been conducted.	<ul style="list-style-type: none"> <li>• Board Minutes</li> <li>• Appraisal Document w/ compensation analysis and discussion</li> </ul>	The full results of the appraisal do not need to be submitted, however, documentation should clearly show it has been conducted.
7.5	The governing board reviews and approves CEO/Executive Director compensation within every calendar year.	Agency should submit documentation that shows the compensation was discussed within the review process.	<ul style="list-style-type: none"> <li>• Board Minutes</li> <li>• Appraisal Document w/ compensation analysis and discussion</li> </ul>	The full results of the appraisal do not need to be submitted; however documentation should clearly show it has been conducted.
7.6	The Organization has a policy in place for regular written evaluation of employees by their supervisors.	Agency should submit the evaluation policy included in their personnel manual.	<ul style="list-style-type: none"> <li>• Evaluation Policy</li> </ul>	Documentation is same as above.
7.7	The Organization has a whistleblower policy that has been approved by the governing board.	Agencies must submit documentation that shows an approved whistleblower policy is included in their personnel policies.	<ul style="list-style-type: none"> <li>• Whistleblower Policy</li> <li>• Board Minutes</li> </ul>	In this instance, if the policy is within the larger personnel manual, and the agency shows proof the manual is approved, then that will suffice for this standard. The agency does not need to document explicit board approval minutes for this policy as a standalone.
7.8	All staff participates in a new employee orientation within 60 days of hire.	Agencies should submit dated documentation that shows both the hire date and the orientation date.	<ul style="list-style-type: none"> <li>• Orientation Receipt</li> <li>• Hiring Date documentation</li> </ul>	As the point of this standard is to show orientation within 60 days, both sets of dates in documentation are required for comparison.
7.9	The Organization conducts or makes available, staff development/training (including ROMA) on an ongoing basis.	Agencies should submit training logs that show staff training attendance.	<ul style="list-style-type: none"> <li>• Training Tracker</li> <li>• ROMA training attendance certification</li> </ul>	It is not required that all staff attend ROMA training; however, documentation should show that CSBG staff have attended ROMA. Staff may also submit attendance verification from CAPO training, but will need to request that documentation from CAPO.
<b>Category 8: Financial Operations &amp; Oversight</b>		<b>Required Documentation</b>	<b>Examples</b>	<b>Criteria Details</b>
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.	Agencies must submit evidence that an annual audit has been completed by a CPA in accordance with CFRs and State audit threshold requirements	<ul style="list-style-type: none"> <li>• The audit report</li> <li>• Receipt from the Federal Clearinghouse showing the date the audit report was submitted</li> </ul>	Please see and follow state and federal guidance related to audits.

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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.	Agencies must submit evidence that all findings have been discussed with the governing board and addressed as per board instruction.	<ul style="list-style-type: none"> <li>• Board Minutes</li> <li>• The corrective action plan(s) that have been prepared in response to any audit findings</li> </ul>	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.
8.3	The Organization's auditor presents the audit to the governing board.	Agencies must submit documentation that shows the board received a presentation from the auditor.	<ul style="list-style-type: none"> <li>• Board Minutes</li> </ul>	While this should be documented in minutes, the presentation does not have to be in person. It may be via conference call, etc., but it should indicate that it was done in a way that there was an opportunity for board members to ask questions of the auditor during the presentation.
8.4	The governing board formally receives and accepts the audit.	Agencies must submit documentation that shows the board voted to accept the audit.	<ul style="list-style-type: none"> <li>• Board Minutes</li> </ul>	The definition of Accepted in this instance should be indicated by a vote by the board members and be documented in board minutes.
8.5	The Organization has solicited bids for its audit within the past 5 years.	Agencies must submit evidence that shows that they solicited bids for an audit within the past 5 years.	<ul style="list-style-type: none"> <li>• A copy of the RFP prepared by the agency and submitted to potential auditors</li> <li>• Responses from CPA firms to the RFP</li> <li>• Scoring grid/evaluation sheet of review of RFPs</li> </ul>	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 at the time of the first Standards assessment, the bid process needs to occur as soon as the current contract is completed.
8.6	The IRS Form 990 is completed annually and is made available to the governing board for review.	Agencies must submit documentation that shows Form 990 is made available to the governing board.	<ul style="list-style-type: none"> <li>• Form 990</li> <li>• Board Minutes</li> <li>• Board Materials</li> </ul>	Made available is defined as emailed, presented or distributed at a board meeting, posted to a board-accessible portion of the agency website. However, if the latter is chosen, there must be accompanying documentation to show they were notified it is there.
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 the program; and 2. Balance sheet/statement of financial position.	Agencies must submit documentation that shows the board receives financial reports at each board meeting.	<ul style="list-style-type: none"> <li>• Board Minutes</li> <li>• Board Packets</li> </ul>	Receives in this instances includes distribution and discussion.

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8.8	All required filings and payments related to payroll withholdings are completed on time.	Agencies must submit documentation that shows payroll filings, withholdings, and payments are done on time. This documentation may include information received from a payroll service if used or the organization’s financial management system.	<ul style="list-style-type: none"> <li>• Payroll tax returns</li> <li>• Copies of checks or other documentation that amounts due were paid</li> <li>• Retirement plan documentation</li> <li>• Submittal forms to the retirement plan</li> <li>• Flexible health spending or other similar plan documents</li> <li>• Required flexible health spending or other similar plan document submittal forms</li> </ul>	This includes: federal, state, and local taxes; as well as insurance and retirement payments.
8.9	The governing body annually approves an organization-wide budget.	Agencies must submit documentation that shows the board approves the agency-wide budget.	<ul style="list-style-type: none"> <li>• Board Minutes</li> <li>• Budget</li> </ul>	Documentation must show a vote and approval has occurred.
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.	Agencies must submit documentation that shows the fiscal policies have been reviewed by staff within the past 2 years and approved by the board.	<ul style="list-style-type: none"> <li>• Fiscal Policies</li> <li>• Board Minutes</li> </ul>	Reviews, in this instance, can be defined as periodic and in segments. It is not required that the review occurs in entirety at once. However, if this is the process, the agency should expect to be required to submit multiple board minutes to show the ongoing, segmented review, and each review in board minutes should show approval by the board.
8.11	A written procurement policy is in place and has been reviewed by the governing board within the past 5 years.	Agencies must submit documentation that they have a procurement policy in place and that the board had reviewed within the past 5 years.	<ul style="list-style-type: none"> <li>• Written Procurement Policy</li> <li>• Board Agenda</li> <li>• Board Minutes</li> <li>• Board Packet with Procurement Policy Attached</li> </ul>	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 federal regulations and Agencies are encouraged to review relevant OMB circulars for specifications.
8.12	The organization documents how it allocates shared costs through an indirect cost rate or through a written cost allocation plan.	Agencies must submit documentation that illustrates how it allocates shared costs.	<ul style="list-style-type: none"> <li>• Approval letter (Negotiated Federal Cost Rate)</li> <li>• Updated Cost Allocation Policy Document (Cost Allocation)</li> <li>• Grant Forms Indicating the Entity is using the de minimus Indirect Cost Rate</li> </ul>	If no approved indirect cost rate is in place, the organization must have a written cost allocation plan. A Federally Negotiated Indirect Cost Rate should be currently approved and may be determined or provisional.
8.13	The organization has a written policy in place for record retention and destruction.	Agencies must submit a written policy on record retention and destruction.	<ul style="list-style-type: none"> <li>• Written Policy on Record Retention and Destruction</li> </ul>	The policy must clearly indicate the process for both retention and destruction of both paper and electronic records. This policy can be part of a larger policy document.

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Category 9: Data & Analysis		Required Documentation	Examples	Criteria Details
9.1	The organization has a system or systems in place to track and report client demographics and services customers receive.	This information is collected during the Annual Report.		This Standard is not in the software as documentation is collected elsewhere.
9.2	The organization has a system in place to track family, agency, and/or community outcomes.	This information is collected during the Annual Report.		This Standard is not in the software as documentation is collected elsewhere.
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 strategic program adjustments and improvements identified as necessary.	Agencies must submit documentation that shows the agency has presented program results and data to the board, at least on a quarterly basis.	<ul style="list-style-type: none"> <li>• Strategic Plan Update/Report</li> <li>• Other Outcome Report</li> <li>• Board Pre-Meeting Materials/Package</li> <li>• Email exchanges with the board</li> <li>• Board Minutes</li> <li>• Notes from Staff Analysis</li> </ul>	This standard would be met through board or staff discussions as long as the analysis and discussion are documented. 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.
9.4	The organization submits its annual CSBG Informational Survey data report and it reflects client demographics and organization-wide outcomes.	This information is collected during the Annual Report.		This Standard is not in the software as documentation is collected elsewhere.