Public Hearing
On the FFY 2014-2015
Community Services Block Grant (CSBG) Program
July 18, 2014
Submitted by Karla Digirolamo, Chief Operating Officer
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Introduction

Good morning. My name is Karla Digirolamo. I am the Chief Operating Officer at the New York State Community Action Association (NYSCAA). Thank you for this opportunity to comment on the Proposed FFY 2014-2015 Management Plan for the Community Services Block Grant (CSBG) Program. Thank you in particular to the New York State Department of State for its commitment to Community Action and for helping to ensure that issues affecting low income New Yorkers are a priority for attention and support in New York.

NYSCAA is a non-profit membership agency representing the 49 Community Action Agencies (CAAs) serving all 62 counties in New York State. We are also a direct recipient of CSBG funds through the NYS Department of State, Division of Community Services. We provide training and technical assistance on governance, program services, information technology (IT), fiscal and other issues and we facilitate the network’s information sharing, peer mentoring, leadership development, and collaborative initiatives. NYSCAA coordinates the network’s public policy, legislative and media efforts. We also provide training and technical assistance for the State’s Office for New Americans programs and Indian tribal organizations.

In 2013 NYSCAA provided training to nearly 2000 people in events ranging from small intensive technical assistance and training provided for one agency to statewide and regional events including the RPIC Region II Conference in Mahwah, New Jersey and the 8th Annual Symposium on Poverty and Economic Security which also served as the kick-off event for From Poverty to Opportunity: The NYS Community Action Poverty Tour 2014. The Symposium featured “Nuns on a Bus” creator Sister Simone Campbell and was an informative and inspiring way to honor the achievements of the past 50 years and rededicate ourselves to the work that remains. Board trainings, strategic planning and governance trainings were provided to enhance the monitoring, accountability and effectiveness of CAA’s management and Boards. Training included poverty simulations, ROMA, workshops on trauma and poverty, supervising in a ROMA environment, telling the story of poverty and Community Action, IT and more.

Community Action was a product of the War on Poverty and is a national network dedicated to fighting poverty through innovative direct services and community partnerships and collaborations that support low income people and promote income equality and community economic development. It is
a network that is shaped and governed by the communities it serves and is called upon to measure the nature and impact of its work in an environment of transparency and accountability unique in the social services arena.

For the past three years, NYSCAA has been the lead agency in the federal region two Regional Performance and Innovation Consortium (RPIC,) a project of the federal Department of Health and Human Services to coordinate technical assistance and training, support best practices and enhance capacity and innovation in the CAA’s and state associations in New York, New Jersey, Puerto Rico and the US Virgin Islands. In the upcoming grant period, the emphasis will be on implementation of the organizational standards and of the ROMA Next Generation performance management standards. This grant provides additional support for NYSCAA’s work in New York State and will be critical to the successful implementation of the organizational standards and ROMA Next Generation.

In 2013, 50 eligible entities were funded by federal CSBG funds. Of the 50, 48 are private non-profit Community Action Agencies; two are public agencies that administer funds to local community based organizations. In New York City the Department for Youth and Community Development (DYCD) sub-contracts with more than 170 community-based organizations to serve New York’s diverse low income communities. The Livingston County Planning Department administers CSBG funds.

CAAs are innovators and leaders in their communities, providing flexible and responsive services to help low-income New Yorkers achieve economic security. They are collaborators, partners, and conveners of other providers and allies in their community, maximizing the use of limited dollars, minimizing duplication of services and engaging volunteers and the community in confronting poverty and the myriad challenges facing New York’s low income communities.

Community Action in New York in 2013
For nearly 50 years, Community Action Agencies have been the front line, community-based, federally-designated network of anti-poverty agencies in New York State. We help people achieve stability and build assets to move out of poverty. We empower struggling families to build strengths, relationships and resources. We promote community and economic development and engagement to provide greater opportunities for all members of the community and support for those in need. With a network that can reach every New Yorker, Community Action Agencies create a web of services
across the state with a service structure and service delivery system that ensures that individuals and families in every community in the state can access the services they need to achieve economic security.

Community Action Agencies employ thousands of New Yorkers and in some communities are among the largest employers. They are a vital part of the business community as well as a provider of critical human services and a catalyst for community economic development that benefits every segment of the community. The employees of CAAs contribute to the communities they work and live in; they pay taxes and bring stability to their communities.

Community Action Agencies are significant drivers of economic development and capacity in their communities. In 2012, CAAs leveraged the $59 million in CSBG money they received to bring $799 million in other federal, state and local government funds and private resources into their communities.

CSBG funds are administered in New York State by the Division of Community Services. We want to recognize and thank the Department of State and the Division for their support and advocacy for Community Action. Particular thanks are extended to Secretary of State Cesar Perales for his leadership and support for our work, including his participation in the unique statewide initiative undertaken by NYSCAA this year, From Poverty to Opportunity: The New York State Community Action Poverty Tour 2014. With participation at events by Secretary Perales, Division Director Veronica Cruz and other DOS staff, NYSCAA and the state’s Community Action network are marking the 50 year anniversary of the War on Poverty with a series of events including public forums, speak outs, community outreach, professional education and press events in more than two dozen communities across the state. Hundreds of people have participated in events ranging from a legislative luncheon, poverty simulation, and trauma training to a rollicking block party where community action’s local roots were celebrated and a call to continuing action was answered. We have been educated, informed, and inspired and have been reminded of all that Community Action is and does for New Yorkers.

In many communities in NYS, CAAs are among the first responders after natural disasters, expertise that is in increasing demand as extreme weather conditions become more commonplace. In the last six months alone, three of our upstate agencies had deadly and devastating weather hit their communities.
Even as they confronted risk and damage to agency sites and to themselves, their staff, friends and families, they were called on to provide emergency services--food, water, clothes, shelter, and access to information about disaster relief and services.

CAA’s governing structures are notable for their Tripartite Boards, a hallmark and strength of Community Action that ensures that all segments of the community are heard and those customers’ voices inform and direct services. The local Community Needs Assessments ensure that CAAs are addressing local needs as they emerge and that the services they provide are flexible and tailored to meet those needs.

Community Action provides a wide range of services including asset development which in 2012 assisted 16,623 households to increase their financial assets or skills; employment supports in which 145,515 low income New Yorkers received assistance to reduce or eliminate barriers to living wage employment; child and family development services provided to 150,438 customers; supportive living services that helped 38,177 vulnerable people secure or maintain independent living; emergency assistance, most commonly food and shelter for 51,170 people; and community development activities in which 38,175 people participated to support and promote their community.

Without the coordinated planning and services supported by CSBG through the Community Action network, New York would lose the locally-governed, public-private partnerships that are now the hallmark of the successful anti-poverty programs run by Community Action Agencies. New York’s Community Action network includes a remarkable reservoir of expertise and skills and provides a voice and advocacy for low income people who are all too often silenced and ignored in the dialogues and diatribes about poverty in the United States.

Poverty in New York

As we have undertaken From Poverty to Opportunity: NYS Community Action Poverty tour 2014, we have highlighted the poverty and challenges facing New Yorkers as well as the beauty and strength of New York State, in its land, its people and its communities. We have travelled from end to end, north to south. In each of the communities we have visited, we found great strength and hope but we also saw pain, isolation and hopelessness. We have seen deep, desperate poverty; we have heard stories of great deprivation and loss. And we have seen how, for many people, conditions far beyond their control are altering their lives and our economy in profound ways.
I am taking the opportunity today not only to address the CSBG Management Plan but also to highlight the critical nature of the problems now affecting our low income neighbors and the challenges that the middle and working class are now facing to maintaining their precarious status. Community Action was created to confront and redress poverty on an individual, community, state and national level. That charge is as important today as it was 50 years ago, especially as we now face a backlash against many of the successes of the Economic Opportunity Act and War on Poverty programs and values. Calls for dismantling basic safety net services - nutrition services, housing, education, employment and child care - threaten the stability of our families and the economic stability of many of our communities. The blaming of poor people gives cover to policies which deliberately disadvantage the many and benefit only the wealthiest few, policies proven to be both cruel and counter-productive.

The national network of 1,100 Community Action Agencies has provided life-saving services to millions of people over the past 50 years and has contributed enormously to the economic and social well-being of their communities. But poverty and a growing chasm of income inequality remain.

In 2012, 47.7 million Americans lived in poverty. Nearly three million people, 15.6% of New York’s residents, lived in poverty in 2013, the fourth largest number of people, behind California, Texas and Florida. Over 40,000 New Yorkers worked full time, year round and still lived in poverty. 22.1% of New York’s children lived in poverty and the childhood poverty rates in the cities of Syracuse, Rochester, Utica, Binghamton, and Buffalo are more than three times the national rate. Across the state 54% of children are poor enough to qualify for free or reduced cost lunch.

And the data does not tell the full story of the impact of poverty. Children living in chronic poverty experience a high rate of chronic stress, instability, and food insecurity and are at risk of experiencing adverse health impacts, learning challenges and disabilities, and family disruption. The effects of poverty are long-lasting and profound, on individuals and society.

Startling income inequality and limited income mobility challenge our economy and democracy. According to the United States Census, in 2010, the top 20 percent of Americans earned 49.4% of the nation’s income, while the bottom 15% earned only 3.4% of the nation’s income, living below the poverty line. Gender and racial differences show additional inequalities and substantial numbers of
people work full time and still live in poverty. Many other people have difficulty working due to challenges such as transportation, child care and the irrational nature of benefits which are ended abruptly as a person gets a job.

The Work of Community Action
Community Action promotes policy, economic and social changes to ensure that people living in poverty have meaningful access to opportunity and equality. Community Action addresses the conditions that contribute to poverty and to a community’s economic instability. Community Action promotes personal responsibility and initiative but recognizes that the community must provide fair, efficient and stable economic structures to support individual initiative and growth. Community Action helps people in emergency and crisis situations, from natural disasters to domestic violence, to recover and rebuild their lives. Community Action helps low income people access the education, training, support services, housing assistance, child care, weatherization and other assistance they may need to become self sufficient and stable.

The State’s network of Community Action Agencies include innovators and leaders in their communities, people who provide services, inspire and lead change in their communities and their agencies. CAA’s provide flexible and responsive services to help low-income New Yorkers achieve economic security. They are collaborators, partners, and conveners of other providers and allies in their community, maximizing the use of limited dollars, preventing duplication of services and engaging volunteers.

Community Action’s work is community focused, need-based, outcome driven, accountable, and transparent. The promise and spirit of Community Action demand that high quality, effective and efficient services are provided in an atmosphere of respect, dignity and empowerment. Community Action provides a wide range of services throughout New York State, helping people meet emergency needs while supporting individuals and the community to foster self sufficiency and economic stability and strength.

In recent years, New York has been hit with so many extreme, and devastating, weather events, Governor Cuomo has referred to it as “the new normal.” Hurricane Irene and Tropical Storm Lee, Super Storm Sandy, Arthur, those and others wrought massive damage in communities throughout the
state. In each instance, Community Action Agencies were called to respond. And they did, rapidly, consistently, comprehensively.

Community Action Agencies are also called to identify and confront the barriers that put people at risk of poverty and make it so difficult to get out. CAAs help people develop job readiness skills, get and keep jobs and manage their budgets to build assets and escape poverty. They work in partnerships with business and the private sector to promote economic development and they advocate for low income people. Community Action helps meet emergency needs while pioneering work to help move people out of poverty and to educate the community about poverty and the social, political and financial structures that keep so many people trapped.

CAAs are outcome focused and provide a wide range of services in a highly transparent and accountable way. Their services and priorities are set by the Tripartite Board structure that promotes an informed, inclusive and accountable management and service environment.

2014-2015 CSBG Management Plan

This plan assumes that funding for FFY 2015 will be at the same level as for FFY 2014, $58,926,175. CSBG funds are provided to 50 grantees including 48 non-profit CAAs and two public CAPs. The plan notes that funding for the Newburgh Community Action Committee, Inc. was terminated in January 2014 and an RFP was issued in May 2014 to provide CSBG services in the City of Newburgh.

90% of the funds are directed to eligible entities; 5% for state administration; 0.5% for Tribes and Tribal Organizations; and 4.5% for discretionary programs including Special Projects, T/TA, Emergency Services and Disaster Relief.

In addition to providing continuing support to three Tribes/Tribal Organizations, the targeted discretionary funds support innovative initiatives such as workforce development and community and neighborhood-based anti-poverty programming including services through the NYS Office for New Americans.
Discretionary funds will be used for special projects and for training and technical assistance by providers including NYSCAA, NASCSP, the National ROMA Peer to Peer Training Program, Community Action Angels and qualified community action agencies.

Training and technical assistance will be provided to help eligible entities meet the national organizational standards and the performance management standards included in ROMA Next Generation and to assist agencies with capacity building activities and responses to corrective actions. When the organizational standards are implemented and finalized by HHS/OCS, contracts will require that all eligible organizations meet all applicable standards. Remaining discretionary funds may be made available for disaster relief and emergency services.

The Plan notes that DOS will continue to use the Comprehensive Organizational Review and Evaluation (CORE) to monitor grantees and will modify it as necessary to address the national standards or other HHS/OCS requirements. The national organizational standards are an important reference for this plan, with standards reflected and referenced in program monitoring and in the T/TA plans.

The Management Plan affirms a commitment to identify and resolve issues that may put an agency at-risk and to develop a corrective action plan and provide the resources and support where necessary to correct identified weaknesses or deficiencies.

**NYSCAA urges DOS to consider the following**

- CSBG funds support the administrative costs needed to run a CAA. Other state contracts do not do so, putting pressure on the agency and the CSBG funding. The state should provide an adequate, consistent allocation to support the administration and management needed to run a high quality organization.

- Agencies need sufficient notice and turn-around time for the preparation and submission of information, reports, contracts and things such as comments on the CSBG Management Plan. The consistently tight turn-around times that are commonplace now make it difficult to produce high quality work in a thoughtful and collaborative way.

- Funding for Community Action’s Services has gotten tighter and more difficult to access as it has for have all social services and community-based programs. CAAs ask that DOS direct
discretionary funds to help current grantees meet the many needs they have identified and are unable to meet with current resources.

- The statewide network of CAAs notes the importance of input into the funding and delivery of training and technical assistance and encourages DOS to continue to support NYSCAA in the delivery of the wide range of T/TA needs that enhance and support the work of the CAA network.

- NYSCAA recognizes and thanks DOS for their support for the Community Action Angels, the innovative statewide project to build CAA capacity through volunteer coordination and recruitment. Their innovative and unique programs should continue to be supported by DOS.

- Regarding the Corrective Action, Termination and Reduction of Funding discussed on page 15 of the plan, NYSCAA supports the commitment to a clear and fair process to ensure early identification of vulnerable programs and a process for offering support to assist them in correcting their deficiencies and working toward program stability and best practices. This process should include T/TA from providers who are knowledgeable and experienced in working with CAA’s and who are committed to the strength and vitality of the network.

- Programs that seek to improve their practice or self-identify weaknesses should have access to T/TA in a manner that promotes program improvement with minimal risk that such program will be identified as vulnerable because of this willingness to seek help or to improve quality.

- The CSBG Advisory Council is an important forum and an opportunity for ongoing input into New York’s CSBG process. Timely and comprehensive information should be shared with the network of CAAs about their activities, priorities and meetings.

- There is a need for training for direct care and front line CAA staff. NYSCAA has worked to respond to the need with a number of new workshops and trainings. Resources however are extremely limited. Additional funds for training for front line workers would contribute to capacity building at the Association and CAA levels.

**Other Comments and Concerns**

- Implementation of the governor’s MWBE initiative, which NYSCAA and its member agencies support, has been inconsistent and confusing. DOS has been forthcoming and clear about their interpretation of the order and how they will enforce it in their CSBG contracts. Other agencies, however, have not communicated or have communicated confusing and inconsistent information. This has been a particular challenge with weatherization contracts.

- The Grants Gateway system promises to bring significant efficiency to New York’s grants making process. The initial phase has included some challenges that appear to be resolved but a number of agencies continue to experience problems with the pre-qualification process. Ongoing attention will need to be paid to this new system as it goes to full capacity to ensure grantees are able to successfully navigate it and it brings the efficiency savings predicted.
• Many in New York’s CAA network have long advocated for the creation of a Commission on Poverty and Economic Security. This would promote a focused effort to address poverty across state agencies and would address issues ranging from work and employment supports to the need to improve our public benefit and support systems.

Thank you again for the opportunity to offer comment today. We look forward to working with DOS/DCS and the Legislature over this next year and into the future to help address the issue of poverty in NYS.

Thank you.