

WHAT IS A COMMUNITY ACTION AGENCY?

A Review of Current and Past Legislation



**National Association of Community Action Agencies
Washington, DC**

Summer, 2000

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FOREWORD

It is sometimes difficult to explain to people who are not involved what exactly is meant by the phrase “Community Action Agency.”

After all, there are other community-based human services organizations. Typically, these organizations deal with a particular issue such as jobs or housing. Or they may focus on a particular target population like children, farmworkers, or senior citizens. These other organizations have recognized expertise in their areas of specialization. Many do excellent work on behalf of their constituents.

However, CAAs are different. They have received governmental designation to carry out their mission – to reduce or eliminate the causes and conditions of poverty in their communities. They employ a variety of means to accomplish that mission. They can address any or all aspects of poverty. They are generalists and take a comprehensive approach to the elimination of poverty. They can be either public or private organizations. Maximum feasible participation of the poor in the operation of the CAA remains a core value.

This report, which is the result of NACAA’s “What Is A Community Action Agency?” project, includes a one-page statement that defines a Community Action Agency and describes its purpose, mission, structure and mode of operation. The remainder of the report provides documentation and support for the one-page statement through an analysis of relevant legislation, regulation and other relevant sources.

The one-page statement is designed to assist CAAs in explaining their mission more easily to federal and state officials, as well as other potential funding sources. The Community Services Block Grant (CSBG) is the source of core funding for CAAs. However, the CSBG Act uses the phrase “eligible entities” to describe the recipients of block grant funding. While the vast majority of “eligible entities” under the Community Services Block Grant Act are CAAs, some are not. The difference is crucial and needs to be understood.

The report highlights the characteristics that make CAAs unique in their communities. I believe that it will reinforce each agency’s sense of being part of a national network with a distinct approach to alleviating poverty, a long history of success, and a stable base of support.

Over time, the legislation, regulations and administrative decisions that impact on CAAs have changed. As this report shows, one thing has stayed the same – the unquenchable spirit of Community Action on behalf of the nation’s poor.

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WHAT IS A COMMUNITY ACTION AGENCY?

1 Introduction

At its meeting in San Diego, California, December 3-4, 1999, the NACAA Board of Directors authorized a project whose purpose was to define the term "Community Action Agency" and to identify its essential characteristics. This led to the development of a one-page statement on "What is a Community Action Agency?"

The "What is a Community Action Agency?" project is the "third leg of a stool," the other two of which are the NACAA Code of Ethics and the Certified Community Action Professional (CCAP) program. The latter two pertain to individuals operating in a Community Action Agency, while the first defines and describes the Community Action Agency itself.

This technical report provides the background, rationale and documentation for the one-page statement. It is not a formal legal analysis. Rather, it is a review of past and present legislation and other supporting documentation in order to identify the key characteristics of a Community Action Agency.

2 Background

Poverty persists in America's communities. The problems created by poverty are large and complex. In order to combat poverty, it is necessary that the community as a whole work together. Community Action Agencies were created to foster this comprehensive approach in attacking the causes and conditions of poverty.

Over their thirty-five year history, the nation's more than 900 Community Action Agencies have undergone many changes. Created originally under the Economic Opportunity Act of 1964, they were subject to a body of federal legislative and regulatory requirements. The process of formal designation by local government and recognition at the federal level made a Community Action Agency relatively easy to distinguish from other community-based organizations

When the Community Services Block Grant was established in 1981, most of the federal requirements were eliminated. The states now assumed responsibility for new designations, core funding (under the Block Grant) and oversight of Community Action Agencies. Community Action Agencies were designated as "eligible entities" under the Community Services Block Grant Act, entitling them to funding under the Block Grant upon meeting certain statutory requirements.

While these requirements are in general consistent with those contained in the Economic Opportunity Act of 1964, they have been extended to include limited purpose organizations, such as the migrant and seasonal farm workers group, which serve the "general purposes of a community action agency" under Title II of the Act.

Community Action Agencies have continued to function in accordance with the vision and values expressed in the Economic Opportunity Act. However, now it has become more difficult to demonstrate to the general public what makes Community Action Agencies different from other types of community-based organizations.

4 Historical Legislation and Regulation

4.1 Purpose

The roots of the Community Action Agencies lie in the Economic Opportunity Act of 1964. The Act, under which Community Action Agencies were originally authorized, contains the following Statement of Purpose:

The United States can achieve its full economic and social potential as a nation only if every individual has the opportunity to contribute to the full extent of his capabilities and to participate in the workings of our society. It is therefore the policy of the United States to eliminate the paradox of poverty in the midst of plenty in the Nation by opening to everyone the opportunity for education and training, the opportunity to work, and the opportunity to live in decency and dignity. (Section 2)

While the Economic Opportunity Act was repealed in 1981, these words continue to inspire people engaged in community action and other antipoverty activities.

4.2 Mission

Title II of the Act authorized the Urban and Rural Community Action Programs. The specific mission given to Community Action Agencies funded under Title II of the Economic Opportunity Act was as follows:

[T]o stimulate a better focusing of all available local, state, private, and federal resources upon the goal of enabling low-income families, and low-income individuals of all ages, in rural and urban areas to attain the skills, knowledge, and motivations and secure the opportunities needed for them to become fully self-sufficient. [Section 201(a) of the EOA, 42 U.S.C. 2781(a) (1967)]

4.3 Structure

In 1967, Representative Edith Green of Oregon introduced an amendment providing for greater control of Community Action Agencies by local elected officials. Her amendment redefined a Community Action Agency as:

...a state or political subdivision of a state (having duly appointed governing officials), or a combination of such political subdivisions, or a public or private non-profit agency or organization which has been designated as such by a state or political subdivision... [42 U.S.C. #2790 (a)(1980)]

The amendment permitted states or local units of government to designate a public or private organization as a Community Action Agency. If the Agency complied with specific statutory and regulatory requirements, the Office of Economic Opportunity would then recognize it as such for purposes of federal funding.

State and local governments had the option of opting out of the designation process altogether if they did not want a Community Action Agency in their jurisdictions. They could also revoke a designation they had made previously. The distinction between “designating” and “recognizing” a Community Action Agency was not trivial. It meant that the Office of Economic Opportunity made the ultimate determination of the Agency's status, and hence its eligibility, for federal antipoverty grants.

the revitalization of low-income communities, and the empowerment of low-income families and individuals in rural and urban areas to become fully self-sufficient...” (Section 672)

5.2 Mission

The mission of a Community Action Agency is to “assist low-income families and individuals... to remove obstacles and solve problems that block the achievement of self-sufficiency...” (Section 676)

5.3 Structure

The 1998 amendments to the Community Services Block Grant Act specify certain requirements that must be met in order for an applicant to qualify as an eligible entity.

In order for a private, nonprofit entity to be considered an eligible entity, it must administer the Community Services Block Grant program through a tripartite board. The tripartite board structure is a critical element differentiating Community Action Agencies from other community-based organizations.

The board must be constituted such that:

- (1) One-third of the members of the board are elected public officials holding office on the date of selection, or their representatives.
- (2) No fewer than one-third of the members are persons chosen in accordance with democratic selection procedures adequate to assure that these members are representative of low-income individuals and families in the neighborhood served.
- (3) The remainder of the members are officials or members of business, industry, labor, religious, law enforcement, education, or other major groups and interests in the community served.

Under the 1998 amendments, there are similar requirements regarding board structure for public organizations seeking designation as eligible entities. However, the state now also has the option of creating a different mechanism so long as it assures decision-making and participation by low-income individuals in the development, planning, implementation, and evaluation of programs funded under the Block Grant.

Although the term “eligible entity” is used throughout, these requirements largely carry forward the provisions of the 1967 Green Amendment to the Economic Opportunity Act of 1964, which established requirements for the structure of CAA boards.

The Community Services Block Grant Act as amended by the Coats Human Services Act of 1998 also gives the state authorization to designate new Community Action Agencies under certain circumstances.

If any geographic area of a state is not, or ceases to be, served by an eligible entity under this subtitle...the chief executive officer of the state...may solicit applications from, and designate as an eligible entity

- (1) A private nonprofit organization...that is geographically located in the unserved area, that is capable of providing a broad range of services designed to eliminate poverty and foster self-sufficiency, and that meets the requirements of this subtitle

In 1984, the Community Services Block Grant Act was further amended by the Human Services Reauthorization Act (P.L. 98-558). These amendments to Section 673(1) of the Community Services Block Grant Act omitted reference to grantees receiving financial assistance under Section 221 of the Economic Opportunity Act. The legislative history makes no mention of why this change to the definition of eligible entities was made.

At the time of the 1984 amendments, the only information provided to the states by the HHS' Office of Community Services was a copy of the amendments. In the preamble to the final regulations published on October 13, 1987 (52 Fed. Reg. 37,957), the Administration on Children and Families in HHS listed six categories of organizations which could be considered an eligible entity. One of the categories was "a limited purpose agency" under Title II of the Economic Opportunity Act of 1964 for 1981 which served the general purposes of a Community Action Agency.

In order to meet the "general purposes" of a Community Action Agency, it clearly is necessary to know what a Community Action Agency is. For this purpose, it is necessary to return to the Economic Opportunity Act. (See below.)

5.4 Mode of Operation

Under Section 676, the states provide a series of thirteen "assurances" regarding the use of block grant funds. These assurances provide a framework for the Community Action Agency's mode of operation. For example, there is an assurance that eligible entities will use block grant funds to "support innovative community and neighborhood-based initiatives..."

As eligible entities, Community Action Agencies must "coordinate and establish linkages between governmental and other social services programs to assure the effective delivery of such services to low-income individuals." In particular, under the 1998 Coats amendments, the Agencies are expected to "coordinate the provision of employment and training activities... with entities providing activities...under the Workforce Investment Act of 1998..." Additionally, they should "form partnerships with other organizations serving low-income communities..."

As part of their planning, monitoring and evaluating activities, Community Action Agencies must develop "a community action plan...that includes a community needs assessment for the community served..." They must also participate in the Results Oriented Management and Accountability (ROMA) system or an equivalent system that incorporates measurement of achievement of "eligible entity performance in promoting self-sufficiency, family stability and community revitalization..."

6 Other Source Documentation: New Partnerships Project

The New Partnerships Project was operated by NACAA in 1989 and 1990. The Project was funded by the Office of Community Services as part of the T&TA grant to NACAA. About \$35,000 was invested in the development of two new types of relationships in two states, Florida and California. (Seventeen states asked to participate and NACAA selected two based on the funds available.) Jim Masters of the Center for Community Futures was the project director.

The Project is relevant to defining "What is a Community Action Agency?" because it helped the participating Community Action Agencies to identify their unique characteristics as compared to other organizations in their communities.

the community level in a manner that would result in a measurable and potentially major impact on the causes and conditions of poverty.

Structurally, they could be identified by a tripartite board structure that guaranteed a voice for public officials, private sector representatives and low-income people in planning and carrying out the Agency's activities. The mode of operation of a Community Action Agency included an assessment of the community's needs and strengths, the delivery of gap-filling services, and partnership with other institutions in attacking poverty and assuring the "maximum feasible participation of the poor."

There are strong similarities between the Community Services Block Grant Act and the Economic Opportunity Act. The purpose of the Block Grant is the "reduction of poverty, the revitalization of low-income communities, and the empowerment of low-income families and individuals in rural and urban areas to become fully self-sufficient."

The specific mission of a Community Action Agency as an eligible entity is to assure the effective delivery of services to low-income individuals and families with the goal of helping them become self-sufficient. The language in the Community Services Block Grant Act describing eligible entities sustains the link between the Economic Opportunity Act of 1964 and Community Action Agencies.

The board structure is similar under both statutes and reflects a continuing concern in Congress that Community Action Agencies involve all major community groups and institutions in the planning and management of its programs.

Unlike the Economic Opportunity Act, however, the Block Grant tends to emphasize delivery of services over advocacy and community organizing, and changes in individuals and families over wholesale impact on the entire community. Nevertheless, there are clear threads linking the definition and role of Community Action Agencies under both statutes.

However much references to community action may have changed over time in law and regulation, the spirit of community action is a constant. The one-page statement by NACAA's Board of Directors on "What Is A Community Action Agency?" is an attempt to capture that spirit.

Appendix 1: Excerpts from the Economic Opportunity Act of 1964

Findings and Statement of Purpose

...The United States can achieve its full economic and social potential as a nation only if every individual has the opportunity to contribute to the full extent of his capabilities and to participate in the workings of our society. It is therefore the policy of the United States to eliminate the paradox of poverty in the midst of plenty in the Nation by opening to everyone the opportunity for education and training, the opportunity to work, and the opportunity to live in decency and dignity. (Section 2)

The basic purposes which Congress had in funding programs under Title II were outlined in section 201(a) of the EOA, 42 U.S.C. 2781(a) (1967) as follows:

[T]o stimulate a better focusing of all available local, state, private, and federal resources upon the goal of enabling low-income families, and low-income individuals of all ages, in rural and urban areas to attain the skills, knowledge, and motivations and secure the opportunities needed for them to become fully self-sufficient. Its specific purposes are to promote, as methods of achieving a better focusing of resources on the goal of individual and family self-sufficiency

- (1) the strengthening of community capabilities for planning and coordinating federal, state, and other assistance related to the elimination of poverty, so that this assistance, through the efforts of local officials, organizations, and interested and affected citizens can be made more responsive to local needs and conditions
- (2) the better organization of a range of services related to the needs of the poor, so that these services may be made more effective and efficient in helping families and individuals to overcome particular problems in a way that takes account of, and supports their progress in overcoming related problems
- (3) the greater use, subject to adequate evaluation, of new types of services and innovative approaches in attacking the causes of poverty, so as to develop increasingly effective methods of employing available resources
- (4) the development and implementation of all programs and projects designed to serve the poor or low-income areas with the maximum feasible participation of residents of the areas and members of the groups served, so as to best stimulate and take full advantage of capabilities for self-advancement and assure that those programs and projects are otherwise meaningful to and widely utilized by their intended beneficiaries
- (5) the broadening of the resource base programs directed to the elimination of poverty, so as to secure, in addition to the services and assistance of public officials, private religious, charitable, and neighborhood organizations, and individual citizens, a more active role for business, labor, and professional groups able to provide employment opportunities or otherwise influence the quantity and quality of services of concern to the poor

- (C) a description of how funds made available through grants made under section 675C(a) will be coordinated with other public and private resources
 - (D) a description of how the local entity will use the funds to support innovative community and neighborhood-based initiatives related to the purposes of this subtitle
- (4) An assurance that eligible entities in the state will provide, on an emergency basis, for the provision of such supplies and services, nutritious foods, and related services, as may be necessary to counteract conditions of starvation and malnutrition among low-income individuals
 - (5) An assurance that the state and the eligible entities in the state will coordinate, and establish linkages between, governmental and other social services programs to assure the effective delivery of such services to low-income individuals and to avoid duplication of such services, and a description of how the state and the eligible entities will coordinate the provision of employment and training activities...with entities providing activities...under the Workforce Investment Act of 1998
 - (6) An assurance that the state will ensure coordination between antipoverty programs in each community in the state
 - (7) An assurance that the state will permit and cooperate with federal investigations undertaken in accordance with section 678D
 - (8) An assurance that any eligible entity...will not have its funding terminated under this subtitle, or reduced below the proportional share of funding the entity received in the previous fiscal year unless, after providing notice and an opportunity for a hearing on the record, the state determines that cause exists for such termination or such reduction, subject to review by the Secretary as provided in section 678C(b)
 - (9) An assurance that the state and eligible entities in the state will, to the maximum extent possible, coordinate programs with and form partnerships with other organizations serving low-income residents of the communities and members of the groups served by the state, including religious organizations, charitable groups, and community organizations
 - (10) An assurance that the state will require each eligible entity in the state to establish procedures under which a low-income individual, community organization, or religious organization, or representative of low-income individuals that considers its organization, or low-income individuals, to be inadequately represented on the board (or other mechanism) of the eligible entity to petition for adequate representation
 - (11) An assurance that the state will secure from each eligible entity in the state, as a condition to receipt of funding...a community action plan...that includes a community-needs assessment for the community served
 - (12) An assurance that the state and all eligible entities in the state will, not later than fiscal year 2001, participate in the Results Oriented Management and Accountability System, another performance measure system for which the Secretary facilitated development pursuant to section 678E(b), or an alternative system for measuring performance and results that meets the requirements of that section, and a description of outcome measures to be used to measure

Appendix 3: Eligible Entities under the Community Services Block Grant Act as amended by the Coats Human Services Reauthorization Act of 1998 (Public Law 105-285)

Section 676A. Designation and Redesignation of Eligible Entities in Unserved Areas

- (a) Qualified Organization In or Near Area
- (1) In general. If any geographic area of a state is not, or ceases to be, served by an eligible entity under this subtitle, the chief executive officer may solicit applications from, and designate as an eligible entity
- (A) a private nonprofit organization (which may include an eligible entity) that is geographically located in the unserved area, that is capable of providing a broad range of services designed to eliminate poverty and foster self-sufficiency, and that meets the requirements of this subtitle
- (B) a private nonprofit eligible entity that is geographically located in an area contiguous to or within reasonable proximity of the unserved area and that is already providing related services in the unserved area
- (2) Requirement. In order to serve as the eligible entity for the area, an entity described in paragraph (1)(B) shall agree to add additional members to the board of the entity to ensure adequate representation
- (A) in each of the three required categories described in subparagraphs (A), (B), and (C) of section 676B(a)(2), by members that reside in the community comprised by the unserved area; and (B) in the category described in section 676B(a)(2)(B), by members that reside in the neighborhood to be served.
- (b) Special Consideration. In designating an eligible entity under subsection (a), the chief executive officer shall grant the designation to an organization of demonstrated effectiveness in meeting the goals and purposes of this subtitle and may give priority, in granting the designation, to eligible entities that are providing related services in the unserved area, consistent with the needs identified by a community-needs assessment.
- (c) No Qualified Organization in or Near Area. If no private, nonprofit organization is identified or determined to be qualified under subsection (a) to serve the unserved area as an eligible entity the chief executive officer may designate an appropriate political subdivision of the state to serve as an eligible entity for the area. In order to serve as the eligible entity for that area, the political subdivision shall have a board or other mechanism as required in section 676B(b).

Section 676B. Tripartite Boards

- (a) Private Nonprofit Entities
- (1) Board. In order for a private, nonprofit entity to be considered to be an eligible entity for purposes of section 673(1), the entity shall administer the community services block grant program through a tripartite board described in paragraph (2) that fully participates in the

Appendix 4: Specific References to Community Action in the Community Services Block Grant Act

The mission of the Community Action Agencies is contained in the purpose of the Community Services Block Grant Act. Under Section 672 of the Coats Act of 1998, it is stated that the purpose of the Block Grant is “to provide assistance to states and local communities, working through a network of **community action agencies** and other neighborhood-based organizations, for the reduction of poverty, the revitalization of low-income communities, and the empowerment of low-income families and individuals in rural and urban areas to become fully self-sufficient...”

The phrases “community action agency” and “community action plan” are used in several other places throughout the Community Services Block Grant Act of 1981 as amended and the Coats Human Services Act of 1998. The words are never defined as such but there is an explicit link in one instance to the earlier Economic Opportunity Act of 1964. In the following excerpts from the Act, the words are shown in bold.

Title I Head Start Programs—Section 116. Research and Evaluation

In designing the research, the Secretary shall, to the extent practicable, consider addressing possible sources of variation in impact of Head Start programs, including variations in impact related to such factors as...(E) the type of organization (such as a local educational agency or a **community action agency**) providing services for the Head Start program...

Title II – Community Services Block Grant Program

(A) Section 675C. Uses of Funds

Use of remainder. If a state uses less than 100 percent of the grant or allotment received under section 675A or 675B to make grants under subsection (a), the state shall use the remainder of the grant or allotment under section 675A or 675B (subject to paragraph (2)) for activities that may include...(F) supporting innovative programs and activities conducted by **community action agencies** or other neighborhood-based organizations to eliminate poverty, promote self-sufficiency, and promote community revitalization...

(B) Section 676. Application and Plan

[The following is one of thirteen assurances that the state provides in carrying out activities under the CSBG.]

- (11) an assurance that the state will secure from each eligible entity in the state, as a condition to receipt of funding by the entity through a community services block grant made under this subtitle for a program, a **community action plan** (which shall be submitted to the Secretary, at the request of the Secretary, with the state plan) that includes a community- needs assessment for the community served, which may be coordinated with community-needs assessments conducted for other programs...

(C) Section 678E. Accountability and Reporting Requirements

- (1) Performance measurement. The Secretary, in collaboration with the states and with eligible entities throughout the Nation, shall facilitate the development of one or more model performance measurement systems, which may be used by the states and by eligible entities to measure their performance in carrying out the requirements of this subtitle and in achieving the goals of their **community action plans**...

Appendix 5: Excerpt from “New Partnerships Projects: Final Report”

Standard I

The CAA has a written MISSION STATEMENT with roles specified in it that make the agency a CAA as opposed to a generic non-profit. Some examples of traditional roles are given in “a” through “o” below. CAAs should be reviewed in terms of the extent to which their mission is generally consistent with the statements below.

- (a) CAAs are **ADVOCATES** for the poor. A CAA voices the needs of the poor community. CAAs bolster other state and local agencies that have a role to help low-income people, e.g., CAAs provide the support for them.
- (b) **RESOURCE MOBILIZATION**. The CAA will seek to expand the types and amounts of funds to assist low-income people.
- (c) **CATALYST**. The CAAs help people help themselves. CAAs help empower individuals, families and communities, and to assist them in enhancing their dignity and self-respect.
- (d) CAAs provide **LINKAGE** between low-income people, government, private service providers, and the business community.
- (e) **CHANGE AGENTS**. CAAs promote institutional and personal change. CAAs should **PROMOTE** their values to both existing and new stakeholders. CAAs must market the CAA and its mission.
- (f) **PLANNERS** of services. CAAs identify needs within the community. CAAs **EDUCATE** the public, and dispel myths about low-income people and ethnic groups.
- (g) **COORDINATOR** of services. CAAs fill gaps left between other service providers. CAAs have **BROKER** role.
- (h) **PROVIDE** some services. CAAs deliver some services, especially Demonstration Programs that have a special risk. CAAs are often the **INCUBATOR** for new programs. They are a **PROVING GROUND** for new programs. CAAs are **INNOVATORS**. CAAs maintain **FLEXIBILITY** to respond to changing circumstances.
- (i) **OUTREACH**. CAAs get information out to low income people. CAAs **RECRUIT** participants for CAA operated programs and for other programs.
- (j) CAAs engage in **WIDE SCOPE** of activity. CAAs seek to create and provide comprehensive services versus a single service. If the CAA performs case management the goal is to provide or obtain comprehensive service for individuals and families.
- (k) **TRAINING GROUND**. CAAs provide experience, training and opportunity for upward mobility for people who are:
 - Board (policy-making, governance)
 - Staff (skills training and work experience)

Appendix 6: Annotated Bibliography

Currently Applicable Legislation and Regulations

Omnibus Budget Reconciliation Act of 1981, as amended (P.L. 97-35)

Title VI is referred to as the Community Services Block Grant Act, as amended.

Community Opportunities, Accountability, and Training and Educational Services Act of 1998, P.L. 105-285.

Also cited as Coats Human Services Reauthorization Act of 1998. Sections 676A and 676B spell out the requirements for an organization to qualify as an eligible entity for purposes of receiving funds through the block grant.

- (1) U.S. Department of Health and Human Services/Departmental Appeals Board/Appellate Division. Pennsylvania Directors' Association for Community Action, Docket No. A-94-51. DAB Decision No. 1482, July 6, 1994.
- (2) U.S. Department of Health and Human Services/Departmental Appeals Board/Civil Remedies Division. Pennsylvania Department of Community Affairs, Administration for Children and Families v. Pennsylvania Department of Community Affairs. Docket No. C-92-040. CR No. 269, June 1, 1993.
- (3) U.S. Department of Health and Human Services/Office of Community Services, *Brief Filed Before the Departmental Appeals Board, Civil Remedies Division, in the Matter of Pennsylvania Department of Community Affairs*. Docket No. C-92-040. No date.

While neither legislation nor regulation, this case as represented in the three documents referenced above provides a valuable summary of the legislative history governing the establishment of Community Action Agencies under the Economic Opportunity Act and subsequent evolution under the Community Services Block Grant Act of 1981, as amended. It also underscores the flexibility given to states in interpreting provisions of the Community Services Block Grant.

The Pennsylvania Department of Community Affairs (DCA) requested a hearing on whether the state of Pennsylvania's determination that the Pennsylvania Directors' Association for Community Action (PDACA) is an eligible entity under section 673(1) of the Community Services Block Grant Act was or was not permissible. At issue was the propriety of Pennsylvania's funding of PDACA from the 90 percent share of CSBG funds that are to be set aside for "eligible entities" as defined in section 673 of the CSBG Act, 42 U.S.C. 9902.

The Presiding Officer for the case found that the state's determination was "clearly erroneous." However, this decision was overturned at the Appellate level of the Departmental Appeals Board. The Board contended that the Community Services Block Grant Act gave states maximum discretion in administering their block grants, even if their interpretations differed from one state to another and were at odds with the interpretation of the Administration for Children and Families, where the Office of Community Services is located. From this perspective, the Board decided that Pennsylvania could reasonably hold that PDACA met the "general purposes of a community action agency" as provided for under the CSBG Act and could therefore be considered an eligible entity.

As an OEO issuance, this document applies to all CAAs. It clarifies the role of CAAs in regards to the participation of the poor. The document explains the ways in which the poor should be involved in basic responsibilities and the support that CAAs are responsible for providing in order to strengthen the ability of the poor to participate.

U.S. Office of Economic Opportunity, Executive Office of the President, "The Poor in Community Action Program: A Summary of Rights." Washington, DC, December 1, 1968.

This is a comprehensive list of poor people's rights within CAAs.

Other Relevant Source Documents

Advisory Commission on Intergovernmental Relations, *Intergovernmental Relations in the Poverty Program*, A-29. April 1966. Washington, DC.

The report "examines the background of the Economic Opportunity Act and describes the development of the Act by the Administration and Congress." Within its examination, the report develops several major findings under the heading "Improving the Community Action Program." This report provides valuable insight into the "formative period" of Community Action Agencies.

Masters, James, *New Partnership Project: Final Report*, Berkeley, CA: Center for Community Futures, March 1990.

This Project was developed to assist state CAAs in developing performance standards. Using the states of California and Florida as the focus, the project reviews standards relating to CAA missions, boards, and CAAs themselves.

National Association of Community Action Agencies, *Seeds of Opportunity: A History of Programs Under the Economic Opportunity Act of 1964*, Second edition, Washington DC: NACAA, April 1999.

This booklet provides a short history of Community Action Agencies and briefly reviews the origins, history and current status of each of the initial programs of the Economic Opportunity Act.

National Association of Community Action Agencies, "A Description of Community Action Agency Operations in Fiscal Year 1984," September 22, 1985. Washington, DC 20009.

National Association of Community Action Agencies "Myths and Facts: Community Action Agencies," Washington, DC: NACAA, no date.

National Association of Community Action Agencies, www.nacaa.org/CAAProfile.htm, December 1999.

This page on the National Association of Community Action Agencies' Web site provides a comprehensive statistical picture of CAAs today. Statistics include the numbers of people working in CAAs and people helped by CAAs. The site also includes percentages on the types of services provided by CAAs.

Community Action Code of Ethics

We, as community action professionals ever respectful of cultural diversity, dedicate ourselves to eliminate poverty in the midst of plenty in this nation by opening to everyone the opportunity for education and training; the opportunity to work; and the opportunity to live in decency and dignity, and commit ourselves to:

- Recognize that the chief function of the community action movement at all times is to serve the best interests of the poor.
- Accept as a personal duty the responsibility to keep up-to-date on emerging issues and to conduct ourselves with professional competence, fairness, and effectiveness.
- Respect the structure and responsibilities of the board of directors, provide them with facts and advice as a basis for their decision making, and uphold and implement the policies adopted by the board of directors.
- Keep the community informed about issues affecting the poor and to facilitate communication among the poor, the non-poor private sector, and locally elected public officials.
- Conduct our organizational and operational duties with positive leadership exemplified by open communication, creativity, dedication, and compassion.
- Exercise whatever discretionary authority we have under the law to promote the interests of the poor.
- Serve the community action movement with respect, concern, and responsiveness, recognizing that service to the poor is beyond service to oneself.
- Demonstrate the highest standards of personal integrity, truthfulness, and fortitude in our community action activities in order to inspire confidence in the community action movement.
- Perform our professional duties in such a way so as not to realize undue personal gain.
- Avoid any interest or activity which conflicts with the conduct of our official duties.
- Protect confidentiality in the course of our official duties.
- Strive for personal professional excellence and encourage the professional development of our associates and those seeking to become community action executives.