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# Community Services Administration

WASHINGTON, D.C. 20506


November 23, 1976

Honorable John O. Marsh  
Counsellor to the President  
The White House  
Washington, D. C. 20500

Dear Mr. Marsh:

Per your request of November 16, enclosed is a copy of the  
CSA Briefing Book. A copy of this book will also be furnished  
to Mr. K. Z. Chavis, our counterpart Transition Officer.

Sincerely,

  
Robert C. Chase  
Deputy Director

Encl.

## I. Introduction

As requested at the November 9th meeting of the transition task force, the following documentation is summary in form and highlights only the more significant of the CSA-related issues with which the new Administration must come to grips in this transition period and be prepared to make decisions on in the first weeks and months after January 20.

Short issue statements (Part II) are followed in some cases by more lengthy supporting documentation (Part III); Part IV (Package) constitutes basic materials concerning the current organization and program for ready-reference.



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A. Re-Authorization and Location of CSA

In accordance with the terms of its authorizing legislation, the CSA expires on June 30, 1978. An OMB directive requires, however, that statutes extending such basic authorities be submitted to Congress one year in advance. Even absent this directive, the principal issues facing the new Administration with respect to CSA will be whether or not to extend the basic authority for an additional period of years, and the related question of whether or not it should be retained as an independent agency in the Executive Office of the President. (Depending on the decision made on this threshold issue, consideration should also be given to other changes in the current statute (see sections D and E).

These decisions will presumably turn on judgments concerning (a) satisfaction with the expressed mission and authorities of the agency, (b) its current and prospective capacity to fulfill that mission in its present, as opposed to some alternative form, (c) the symbolic impact of such a decision in demonstrating the new Administration's priorities to various constituencies, and (d) the status of broader plans for reorganization and consolidation of the Executive Branch. Attachment A-1 is an internal CSA document (Blueprint) which reflects the current CSA management's sense of the primary mission and thrusts of the agency.



## B. Reorganization

In July of this year CSA submitted a reorganization plan to OMB which provided for an increase of staff (from a projected 900 slots at the end of FY '77 to 1187), and a thorough rationalization of the functions, organization, manning tables and classification of the staff. Attachment B-1 constitutes CSA's request to OMB and thoroughly documents the extreme need for such changes and the rationale for the proposed reorganization. Attachment B-2 reflects the pattern of staffing at the level approved by OMB of 1067. The current distribution of "on-board" staff as of November 20, 1976, is reflected at Attachment B-3.

CSA employee union representatives have objected to management's plan to proceed with implementation of the reorganization and has sought help from committee staffs on the Hill in placing a moratorium on further developmental work. We are proceeding, however, on the grounds that:

(a) all the work to be done prior to January 20 is of a ministerial nature, will in no way obligate or tie the hands of new management, and will not adversely affect any current employees. (See Attachment B-4 for a timetable of implementation);

(b) most of the work being done involves the accurate classification of positions in the new organization. By agreement with the Civil Service Commission, the accurate classification of the new positions and the eventual reassignment of individuals into the new positions will accomplish the corrective action required by CSC on currently misclassified positions. (See Attachment B-5); and

(c) we expect new management will, in any event, wish to incorporate most if not all of the changes contemplated and will capitalize upon this preparatory work so they are not encumbered with additional delays upon taking office.

Among the earliest priorities for new management should be a review of the proposed reorganization plan, decisions with respect to any revisions in total numbers of staff they may wish to seek, and/or reallocation of staff positions in hand to reflect any revised thrust in overall agency mission or strategy.

C. Labor-Management Relations

The negotiated agreement between the Community Services Administration, then OEO, and AFGE (AFL-CIO) for National Council of OEO Locals, was signed in March, 1972. Amendments to that contract were negotiated and signed in September, 1973. Many of the resultant contractual disputes focus on agency management's failure at the table to pressure certain mandatory rights (i.e. hiring, promotion) and to safeguard the extent to which bargaining occurred over permissive areas (i.e. budget, organization, staffing).

Neither party has taken the opportunity up to now to request a renegotiation of the present contract. At the moment, both CSA and the Union have tacitly agreed to postpone a possible renegotiation of the contract pending the agency's reorganization. However, the Union has been pushing for midcontract bargaining on the agency's affirmative action plan and the use of official time by Union representatives. (For historical perspective and current assessment, see attachment.)



#### D. Non-Federal Share

Through the early years of the OEO experience, grantees were expected to "match" Federal funds with 10 percent of locally generated funds--in-cash or in-kind. This was subsequently increased to an 80-20 ratio. The Act, as amended in 1974, calls for a further escalation of local share of grantee costs and a reducing Federal share; the final stage in this process is reached in the current fiscal year when large CAA's are to match at a 40 percent level and smaller CAA's at a 30 percent level.

A recent survey supports the position that this additional increase in FY '77 will be unattainable by a large percentage of grantees due to the reduced availability of local resources caused by depressed economic conditions. Failure to meet the new non-Federal share requirements will mean a loss in Federal dollars and diminution of program effectiveness.

Although the waiver authority in section 225(c) could still be exercised, it would have to be exercised broadly and liberally and to do so could be interpreted as changing legislative intent by massive misuse of administrative regulations.

Another problem area is that the legislation provides relief in the form of a lower rate of non-Federal share required of designated community action agencies with funding levels of less than \$300,000 leaving other local initiative grantees of a more limited purpose, regardless of funding level, to pay a higher rate. This has caused problems. For example, all of the CAA's in Maine which were to operate energy programs agreed that the grant would go to the State Economic Opportunity Office and that they in turn would serve as delegate agencies, thus simplifying the administration of the energy program in Maine. If each CAA had accepted a grant the non-Federal share requirement would have been 25 percent. However, because the SEOO was a limited purpose agency it carried a 30 percent non-Federal share requirement.

Many supporters of community action seek a legislative amendment which would return the non-Federal share requirement to 20 percent or even 10 percent; other alternatives are available. We also need to rethink the procedures and timing for calculating and approving or disapproving non-Federal share for individual grantees.

E. Limitation on Grant-Making Authority of the Regional Directors

Section 601(c) of the CSA legislation prohibited delegation of final approval of grants and contracts to the regional offices. These delegations of authority were prohibited by Congress because of (1) growing disenchantment in Congress with Federal regional offices in general, and (2) because some members of Congress felt regional offices were unresponsive to their inquiries.

This changed the system previously in effect which permitted Regional Directors to approve grant and contract proposals submitted by community action agencies in their respective regions. The prohibition has served mostly to increase the workload at headquarters. The designated National Official for final grant and contract approval has signed over 8,000 grants since the amendment became effective, and obviously can not give any of them the substantive attention presumably intended by Congress.

In fact, far from securing greater accountability, the prohibition has kept the agency from its more fundamental responsibility, monitoring and assisting in the performance of regional offices. Compliance with Section 601(c) has also caused serious problems with grantees, since the grant processing time has been increased from seven to ten days; additional delays are caused by the postal system. On many occasions release of funds has been delayed to the extent that grantees have had to borrow money at commercial rates.

This current problem would require a statutory remedy.

## F. Funding Annualization

Controversy over the continuation of the Agency in 1973 resulted in a substantially reduced FY 1974 appropriation for local initiative (Section 221) funding, which is the basic source of funding for our 860 community action agencies.

Prior to 1974, when CSA received full year appropriations, all CAAs were funded at various times during the year for a 12-month period. The reduced funding for FY 74 meant that CSA only had sufficient monies to fund grantees through June 30, 1974. Thus all grantees required refunding on July 1, 1974, as opposed to the more efficient staggered refunding which had occurred in previous years.

This problem was compounded by the fact the agency for several years has not received a full year's appropriation early in the fiscal year, but has been funded by piece-meal "continuing resolutions." As a consequence of these combined factors, the agency had to resort to funding all its CAA grantees for three-month periods instead of staggered funding for twelve month periods. This has taxed the administrative capability of the Agency to process grants in a timely fashion; has prevented grantees from doing long-range planning; and has often resulted in the delay of funding to the CAAs.

In a first step to correct this situation, the Agency during the recent transitional quarter (provided by the change to an October-October fiscal year) shifted some funds from categorical program grantees to local initiative grantees (CAAs) in order to return those CAAs with budgets of \$300,000 and under to annualized funding. This decision, which affects 75% of CAAs, will ease the administrative burden of paperwork generated by the quarterly processing and allow those grantees to plan on the basis of an annual budget.

However, the problem still remains for those CAAs with budgets over \$300,000. The early 1977 appropriation for the Agency will provide some relief in that it will enable CSA to extend the funding period of these grantees beyond three months. But true annualization of these CAAs would require an additional \$100 million in local initiative funding.

G. Energy Programs: Funding and Integration with FEA

For three years CSA has funded a national program of: energy conservation (weatherization of homes), emergency relief to those poor and near-poor unable to gain access to or pay for fuel, and the development of inexpensive alternative energy sources. For Fiscal Year '77, the Congress appropriated \$27.5 million for the first six months of this program with the indication that a matching supplemental appropriation would be made for the second six months of FY '77.

In the fall of this year, the Congress provided renewed authority to the Federal Energy Administration including new authority (Title IVA) to undertake weatherization of the homes of the low-income. The legislative history made it clear that FEA was to coordinate closely with CSA in the development of its regulations and the programs subsequent implementation. FEA has yet to issue its regulations, but it is clear that many substantive differences exist between our respective staffs. These objections include: (1) the lack of any provision in the regulations for the integration of the two weatherization programs at the state and local level; (2) the adherence of the FEA regulations to a weatherization philosophy which conflicts with the theories and standards upon which the CSA program is based, and which results in mandatory funding ranges for material costs that are unrealistic; and (3) the failure of the proposed FEA regulations to avoid the situation where local projects would be faced with different requirements, standards and/or reporting forms.

Three issues must be shortly resolved:

(a) the differences between the two agencies concerning the proposed FEA regulations;

(b) the question of whether one or both of the weatherization appropriations for CSA and FEA will be provided and at what levels; and

(c) the question of identifying sources of funds to provide manpower at the local level to put in place the weatherization materials provided through one or both of the above appropriations. (Heretofore CETA funds and EDA Title X funds have been provided, but the former are discretionary with local sponsors and limited in application and the latter funds run out this winter.)

#### H. Review of OED

The Office of Economic Development (OED), under the mandate of Title VII, Part A, of the Community Services Act, is currently funding 41 community development corporations (CDC's). These CDC's, serving both urban and rural low-income communities, are community-controlled institutions, undertaking comprehensive community development programs which involve a combination of business development, housing and physical development, and supportive social services.

Currently, an internal CSA review of OED policies and procedures is underway to ascertain the adequacy of existing management systems for measuring program performance, venture investment strategies, and the social impact of the CDC's as well as determining the efficacy of criteria for new planning grants. A random sample of 10 operational CDC's (of 27) has been examined in the review. The results are more likely to be suggestive than definitive, but will almost certainly lead to decisions on needed changes in policies and procedures, as well as for further, more intensive evaluations, especially given the current paucity of available data on the program.

## I. Moratorium on OED Planning Grants

The Office of Economic Development now is funding 41 Community Development Corporations and has contemplated providing "planning grants" of approximately \$150,000 each to an additional 8-10 community groups around the country. Such grants are usually for about one year's duration and the expected product is a comprehensive planning document constituting an application for subsequent year operational funds.

In the fall of 1975, OED solicited applications for planning grants and had received almost 90 by December 31, 1975. A thorough internal review of these winnowed the list of candidates to about 10, all of whom are aware they are "prime contenders" and have been expecting to be funded in the current quarter of this fiscal year. We have put a stop on any such funding for reasons indicated below; as a consequence, political pressure in the form of letters from elected officials has started to be felt and is likely to increase.

The basic difficulty with providing funds to these new applicants is not that each is not meritorious in its own right (most appear superior to prior-year applications), but rather that:

(a) if approved, they constitute a contingent mortgage on future year's operational funds and thus--unless expanded appropriations are assured--represent a dilution on our capacity to provide sufficient funds to any existing CDC, thereby diminishing the likelihood that it will make an "appreciable impact" in its target community;

(b) it is not clear that we have adequate staff--either in quantity or quality--to provide the sort of guidance, monitoring, and assistance such an expanded portfolio requires; and

(c) there are basic questions being raised about the effectiveness of the program's operations over the last 6-8 years, and whether as a "demonstration program" it has justified its expansion without undertaking major revisions in design and practices of OED oversight.

J. The Zavala County Economic Development Corporation

The Community Services Administration has been involved in litigation with the State of Texas over the issue of whether a CSA grant to the Zavala County Economic Development Corporation (ZCEDC) was made in violation of the Office of Management and Budget regulation A-95. The regulation requires that private, non-profit corporations making applications to Federal agencies for funding certify to the funding agency that the subject grant application has been submitted to a State clearinghouse for review and comment prior to grant submission. Federal agencies to whom the A-95 regulation applies are prohibited from awarding grant funds without this certification from the grant applicant that opportunity for review was provided to the appropriate state clearinghouse. The burden of informing the applicant that such certification is required is placed upon the funding agency.

CSA did not require the requisite certification of any of its 41 Economic Development Corporation grantees because of an agency-wide misinterpretation of the coverage of the regulation. The Federal Court of Appeals, 5th Circuit, ruled in late November that the A-95 instruction applied to ZCEDC and granted an injunction on the expenditure of any Federal funds by ZCEDC for 60 days to allow the State of Texas an opportunity to review and comment on the ZCEDC application.

The ZCEDC suit is outlined in this report not merely because of the legal issue regarding the application of the OMB regulation, but because the grantee has been viewed as controversial by the State of Texas, the Congress, and the Administration.

The purpose of the ZCEDC grant is to establish an agricultural business to benefit the migrant farm population of Zavala County, an economically depressed area in Texas. The project will provide 30 permanent and 250 part-time jobs to migrant workers who have historically moved in the migrant stream.

The Chairman of the Board of ZCEDC is the leader of La Raza Unida, a third political party in Texas whose membership is predominantly Mexican-American. In 1974, after a visit to Cuba, the Chairman is alleged to have said he intended "to make Zavala County a little Cuba." The neighboring ranchers have objected to the "agricultural venture" project which CSA funds will establish and have used the "Little Cuba" statement to discredit the grant. Moreover, serious grant mismanagement and excessive spending allegations have been made by the public and verified by CSA. In summary, this grant

will continue to receive extensive publicity and will be monitored closely to ensure that CSA regulations are followed. CSA has sent in its own staff to audit the past financial records of the grantee and has notified the grantee of the need to explain apparent irregularities.



## K. Ongoing Initiatives in Systems Development

Over the past few years, many of the CSA management systems necessary for effective operations have been allowed to atrophy. In recent months ad hoc task forces from the national and regional offices have been at work to redesign processes and systems that would permit more effective planning and control. As a general matter, these groups have proceeded in anticipation of a reorganization and the availability of properly placed and trained staff to carry out such systems on an ongoing basis. These efforts will require continued support from the Office of the Director if their momentum is to be sustained; they will in turn generate issues which will require executive resolution. The following work-efforts are illustrative:

### 1. Program Data Collection

Ongoing information systems have not been in place to provide data on how and where program funds are spent and who are the beneficiaries. Developmental work, probably on a contract basis, will be necessary to re-establish permanent systems. In the meantime, a one-time form has been devised and approved by OMB for use this winter.

This National Program Summary (Form 490) is designed to obtain baseline information on the following five program areas by January 1977:

Senior Opportunities and Services  
Community Food and Nutrition  
Housing  
Energy  
Economic Development

The Program Summary will provide the agency a profile of grantee activity in the five program areas; a general picture of the kinds and local mix of projects conducted as elements of these selected programs; an overview of grantee expenditures; and a distribution of the sources of non-CSA cash support mobilized by grantees in carrying out these programs. In addition, the Program Summary will yield basic data on units of service and numbers of persons served.

Specific uses of the Program Summary include:

- use as an information base for Congressional inquiries and 1977 Congressional appropriations hearings;

- use as a medium to strengthen direction and guidance to program and regional offices;

- use as formative input to development of measurable performance criteria, a component activity of ongoing agency efforts to refine its published standards of program and project effectiveness;

- use as a base resource to the initial operations of the Director's Office of Policy Planning and Evaluation to be implemented in reorganization;

- use as an experience base for the annual grantee survey expected as part of the formal agency information system to be in place by fall of 1977; and

- use in reducing an estimated 7800 hours of grantee reporting burden in the next nine months, specifically the Senior Opportunities Services informal survey routinely conducted late in each calendar year (1750 hours); an estimated five major Congressional program inquiries in the period (3250 hours); and an estimated four ad hoc partial-program surveys (2000 hours).

The completed National Program Summary forms will be collected, keypunched, and established in a computerized data base. Aggregate data will be related with such other agency data bases as may be available. Some comparative analyses are intended and selected reports will be disseminated to CSA headquarters and regional offices in late January. A report of the Summary will be provided to grantees.

## 2. Policy Analysis and Evaluation

Under Title IX of the Community Services Act, CSA enjoys a broad mandate to evaluate all anti-poverty programs, whether administered by CSA or other agencies. Unfortunately, this Title has received no appropriation. Under the current reorganization plan, the agency is developing a coordinated policy planning and evaluation system involving the Office of the Director, Headquarters Program Offices, and Regional Offices. The Fiscal Year 1977 Evaluation Plan is undergoing review at the present time. Evaluation activities will focus principally on Local :

Initiative, Community Food and Nutrition, Energy Conservation, and Economic Development. Funds to support these evaluations will come from program budget set-asides.

Concurrently, the agency is in the process of developing performance measures based on the current, more generalized standards of program and project effectiveness. A guidance manual has been drafted which provides Project Managers and Field Representatives with guidelines on how to review grantee funding proposals and actual performance relative to these standards. This manual forms the basis of training sessions which are scheduled for all regional offices prior to the end of the calendar year. These developments are being coordinated with other initiatives involving the short-term gathering of national program summary data and the implementation of a permanent computer-based grantee reporting system. Through the proposed Office of Policy Planning and Evaluation, it is anticipated that the data generated from information systems, program evaluations, and policy analysis studies will serve as the basis for legislative proposals and policy options for the agency's top management.

### 3. Augmentation and Decentralization of Human Rights Functions

The Attorney General has recently published regulations governing the policies and procedures which grant-making agencies must follow to insure effective implementation of Title VI of the Civil Rights Act. Moreover, the Director of CSA has determined that the authority for resolving discrimination complaints should be transferred from CSA's Office of Human Rights in Washington to the ten regions. The purpose of the transfer is to provide a more efficient system of addressing discrimination complaints.

Under the proposed decentralized system for processing discrimination complaints, the functions performed by the Associate Director for Human Rights would become the responsibility of regional officials. (For headquarters-funded grants the Equal Opportunity staff would assume these functions.) The responsibility for monitoring Civil Rights compliance, the quality of case preparation, policy developments, and training for the Human Rights staff will be retained in the Office of Human Rights.

An inter-office task force is preparing the regulations, policies, procedures, and training materials that will effectuate both CSA's expanded Title VI responsibilities and the new decentralized approach to carrying out the full range of human rights activities.

4. Audit Follow-Up Procedures

On November 2, 1976, CSA created a work group to review in detail CSA's policy for obtaining audits of its grantees and the procedures used in resolving audit deficiencies and allowing or disallowing questioned audit costs. (A preliminary analysis indicated that most of the grantee expenditures questioned by independent auditors have been allowed by the responsible program official.) A final report from this work group with recommended changes in policy and procedures is expected shortly.

In addition, CSA is in the process of collecting and reviewing a sample of 55 audit reports to show the basis for allowing and disallowing questioned audit costs used by CSA in the past. This review will be completed in early December and given to the Subcommittee on Manpower and Housing, chaired by Congressman Hicks of Washington State.

PART III

The attached paper is intended to serve as a management tool for shaping CSA's future actions. Since it lays out neither specific objectives nor a specific timetable, it is not a "blue-print" in the same sense as its prototype in architectural and mechanical trades. Moreover, while it does provide an explicit outline of the eventual management capability, it is really only the first step in a process leading to more detailed refinements.

The profile for CSA which emerges here is goal-centered. It represents the Director's view of where the agency should be at some future point. It also provides a frame-of-reference which reflects priority emphasis as to the utilization of staff and financial resources over future months when providing more detailed specifications and undertaking new activities. It is not, in itself, an action document except as it helps to identify discrete areas for the next level of effort and provides general guidance for the direction of those efforts. For example, in evaluation and inter-agency resource mobilization, further detailed strategies and "how to" implementation plans are already being developed.

The focus of the "blue-print" is principally upon what CSA as a Federal agency can and should undertake at the national and regional levels, rather than upon new policies or directions for the world of community action agencies and community development corporations. Even within this focus, those familiar with the OEO mission and history will

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find little that is truly new. The basic legislative mandate and authorization are sufficiently broad and flexible to accommodate the managerial thrusts contemplated. In fact, the "blue-print" in large part reflects a re-affirmation of and renewed priority to roles, responsibilities, and functions that were performed by OEO in previous years.

However, there is also the recognition here that this is not the world of the 1960's or even early 70's, and that in formulating appropriate agency priorities, CSA must now both recognize some new limitations and capitalize upon some newly recognized strengths.

The raw fact of extensive and deep poverty and limited opportunities in a country of unparalleled plenty still provides the basic context for the agency and its reason for being. CSA accepts as a given the need for an independent structure within the Federal family to serve as the exclusive representative agency and conduit of expression for those persons otherwise relatively powerless to impact upon the institutional decisions that affect their lives. However, objectives such as "the total elimination of poverty" are unrealistic, misleading, and likely to be counter-productive. Similarly, CSA itself neither is nor should be so enlarged or empowered to be the single agent for the real and dramatic improvements in economic and social well being which are within the capacity of our nation. This assignment clearly requires not only the efforts of all the specialized program agencies within the Federal establishment, but the full cooperation of other branches of the public

sector and the private sector as well. But CSA can be, and should be, the catalytic agent that insures the focusing and careful orchestration of all these energies and resources upon the problems of the poor.

In emphasizing this role for CSA, it is critical to build upon both the unique decade of innovative social programming and the strengths of the agency. Principal among these are:

- a broad and flexible statutory authorization which permits and encourages both a comprehensive and experimental approach to problem solving;
- a national network of grantees (CAA's, CDC's, SEOO's, LPA's) that serves approximately 75 percent of the nation's poor responsively and efficiently; and
- a vehicle at the local level through which the poor can organize themselves to represent their own interests.





CSA BLUE-PRINT

In the immediate future CSA will direct its efforts in three priority areas:

- serving as representative spokesman for the nation's poor within the Federal establishment;
- serving as the catalyst for focusing all available resources upon the problems of the poor; and
- supporting, guiding, and monitoring more effectively the national network of CSA-funded grantees.

To provide support for these efforts, CSA will strengthen internal CSA administrative, managerial, and organizational systems and procedures.

The thrust of this paper is to highlight and briefly describe the various organizational and managerial functions and activities that CSA will undertake in these three areas. Therefore, it is not the purpose of these descriptions to outline specific policies or programmatic strategies. However, Attachment A includes broad areas that suggest targets of opportunity for CSA efforts when specific implementation plans for evaluation, research, and resource mobilization are formulated.



I. CSA As the Federal Spokesman For the Poor

The Community Services Administration is the Federal government's primary agency for articulating on a government-wide basis the special needs and interests of persons in our nation who live under conditions of poverty, and for directing attention to the impact of all government policies and programs on real choices of low-income persons and families. CSA intends to fulfill this obligation and to reinforce its role as the principal spokesman for the poor within the Federal government. All Federal agencies have a responsibility to be sensitive to the needs of the poor, but CSA must set a standard for responsible advocacy. This must involve closer bilateral ties at all levels with other agencies whose policies

~~and practices impact the poor most significantly and should involve representation in those inter-agency groups which consider new policies which may fundamentally affect national, social, and economic conditions.~~

Our principal means of achieving such relationships cannot be the "justice of our cause", but rather our capacity to contribute insights, analyses, and resources which are important to the achievement of other agency objectives and to the inter-agency deliberations, ~~which are otherwise not obtainable.~~ Thus, our capacity to represent the poor effectively must be undergirded by strong professional competence in the following functional ~~areas, these functions are~~

closely related and mutually reinforcing and can strengthen the Agency's role as a positive catalyst on behalf of the poor.

A. Legislative Analysis and Policy Planning

CSA will <sup>develop</sup> professional staff and institutional tie-ins to insure that new legislative developments which bear promise, whether generated within the agency, elsewhere within the Administration, or without, are carefully analyzed, refined as appropriate, and supported. CSA must have the capacity to be sufficiently abreast of promising state legislation, private initiatives, and our own demonstrations to translate them into legislative packages where they appear replicable on a national scale. Similarly, the results of our own research and evaluation, as well as our acquaintance with external research should result in analyses and conclusions which may affect our own CSA operational policies and/or those of other agencies. Certainly CSA staff should be deeply involved in the design of new legislative ~~xxx~~ and policy thrusts in such areas as welfare and tax reform, revenue sharing, and Federal programs to generate new employment.

B. Basic Research

CSA should play a major role within the Federal establishment in analyzing, coordinating, and calling for new data that leads to deeper understanding of the incidence, causes, consequences, and sources of relief for poverty. CSA should also take a

leadership position in the broad debate on the issue of the most appropriate definition(s) of poverty for statistical as well as program entitlement purposes. In the short-term, our approach will be to stay fully abreast of research developments underway in other agencies, affect the direction of new research, insure proper utilization of important results, and carefully select for our own funding and/or conduct those studies of strategic importance where we have some unique ~~ixx~~ competence.

C. Evaluation

Under Title IX, Community Services Act, CSA has an unparalleled opportunity to exercise its analytical and advocacy roles through the mechanism of program evaluation. <sup>CSA</sup> Toward this end, we plans to create throughout the agency a learning environment in which the results of program evaluation will play a key part in policy formation, program planning, and grantee management.

In implementing a CSA-wide system of evaluation, the agency must do more and better at all levels to determine which programs and projects are meeting their objectives, which ones are not, and what corrective action is indicated. As in the research area, CSA will ~~have to~~ concentrate its limited resources in those areas which have the highest policy and programmatic payoff.

For the immediate future, <sup>CSA</sup> we will develop a one-year and a three-year evaluation plan (including budget) for the agency. In part, this will require a survey of existing and proposed evaluative activity extant in headquarters and the regions. Beyond this, CSA will organize a specific evaluation agenda, incorporating national impact evaluations, program strategy evaluations, and grantee efficiency evaluations. Tied in with this plan will be the development of formal utilization systems to assure that evaluative information is made available in a timely fashion to the agency's executive staff and program managers, to other Federal agencies, to relevant public and private organizations, and to CSA grantees.

In the meantime, CSA is refining its approach to the use of the "standards of effectiveness" as an evaluative device. Through this and related approaches, we intend to strengthen our monitoring capability, as well as the ability of our grantees to perform self-assessments. Once CSA has systematically re-established its evaluation capability and demonstrated its ability to conduct useful, high-quality evaluations of our own programs, the agency will turn its attention to the analysis and evaluation of non-CSA programs impacting upon the poor.

Section 901(a) of the 1974 Act provides the authority for CSA to undertake evaluations of non-CSA programs impacting upon the poor. As a general matter, CSA will move into that area--except on a pilot basis--only after the agency has demonstrated its ability to undertake professional and useful evaluation of its own programs.

D. Pilot Demonstrations and Controlled Experiments

CSA will <sup>rel</sup> establish its role and competence in designing and implementing innovative techniques that staff analysis suggests give promise of filling new and unmet needs of the poor. This can and should be viewed as a risk-taking approach. CSA has a CAA and a CDC network which can be used as appropriate as a laboratory for such action research.

The agency will develop criteria and a process for developing an annual agenda of projects that have genuine merit, have required evaluation elements, and give promise of replication. Careful attention will be paid to the advantages of concentrating our efforts in a limited number of program areas. The objective of any pilot demonstrati<sup>e</sup>~~ons~~ and controlled experiments will be <sup>to</sup> demonstrating the feasibility of techniques and approaches that can be adopted on a broader scale by CSA, or more probably, by other public and/or private institutions;

projects which do not satisfy this fundamental criterion will not be considered for funding.

II. CSA as Catalyst for Mobilizing and Focusing Resources

This second major thrust of CSA is derived from two clear and fundamental premises: that insufficient national resources--both in absolute and relative terms--are devoted to meeting the problems of the poor; and those resources now available are often not spent wisely or well.

It is particularly important for CSA, as it reaches outward to establish new institutional linkages, that this function of "resource mobilization" not be viewed too narrowly. There are three different ways of viewing this challenge to expand our angle of vision: the type of resource available; the method of delivery; and the type of prospective resource provider.

A. Available Resources

Although CSA needs to seek more in the way of cash and in-kind resources, this present preoccupation, born in part of the current legislative necessity to mobilize additional "non-Federal match", should not blind the agency to the full extent of other resources available and needed. More particularly, <sup>CSA</sup> we should seek relationships with strategic elements in the public, private, and voluntary sectors that permit the full and free exchange of data, of experiences with techniques that have or have not worked to relieve poverty, as well as of new approaches that may give such promise. <sup>CSA</sup> We thus need

expert and/or influential participation in advisory committees and boards at all levels and <sup>the agency</sup> ~~we~~ needs to view other institutions as prospective partners in advocacy proceedings on public policy issues. And finally, in any strategy of resource mobilization, CSA must involve the poor in planning and development prior to finalization of major new programs.

B. Methods of Delivery

The national grantee network has demonstrated its managerial and technical competence and uniquely represents and involves the poor themselves. Therefore, in a large majority of cases it provides a preferred delivery vehicle for channelling other public and private resources which are directed to assist the poor. At the national and regional levels, <sup>CSA</sup> ~~we~~ will therefore continue to urge that this conduit be used whenever that appears to best meet common objectives. At the same time, however, there is no need or benefit in this system becoming an "exclusive" deliverer of any program service. Indeed, there may be many situations in which our function as catalyst for expanded resources calls for the support of independent, effective, delivery mechanisms, be they private or public.

The most effective responses to most problems affecting the poor will involve several institutions. Identifying needs, designing programs orchestrated so as to bring to bear the



unique capabilities and resources of varying institutions and marketing those programs to the parties involved, are all functions which CSA at the national, regional, and local levels can undertake with unique competence. Well designed "packages" both bring forth resources otherwise unavailable and focus those resources on worthwhile objectives.

Some public or private institutions other than CSA or its grantees may be the "lead" deliverer in such packages, but that is of secondary importance.

Effective "packaging" requires special entrepreneurial skills and knowledge of the strengths and limitations of other programs and institutions. CSA must not only inculcate and encourage those skills, but will make available throughout its own network and through its utilization system both information about other programs and feedback about those "packages", whether formal demonstrations or local initiatives, which have worked successfully.

C. Resource Providers

The range of resource providers with whom CSA should inter-act is well known.

A major new thrust at the Federal level will be to insure more effective collaboration with other Federal agencies.

CSA will seek to achieve this objective by utilizing inter-agency agreements to secure funds directly and/or by obtaining changes in Federal legislation, regulations, and administrative rulings that will enable CSA grantees and other low-income groups to become eligible to receive initial or additional funding from certain Federal agencies.

Another major element in the more definitive mobilization strategy to be developed is an effective relationship between CSA and state and local units of government. In addition to maintaining a grantee relationship with SECO's, CSA will develop a broad-based strategy that explores partnerships with state and local governments in the planning and delivery of services ~~to~~ and mobilizing collective resources more efficiently.

In addition to public Federal, state, and local institutions, CSA will explore opportunities with private corporate representatives, organized labor, foundations, religious and public interest groups, universities, etc. Some have funds to provide, some have manpower, some have delivery systems; others "know-how" or influence. Some should be contacted and cultivated to promote an enlarged or modified contribution or to coordinate with CSA in planning or implementing programs; others to insure they do not resist or throw up roadblocks to programs benefitting the poor due to misconceptions as to program purposes or outcomes.

III. CSA as Supporter and Monitor of the Grantee Network

For the past few years, for all practical purposes, many of our grantees have had to fend for themselves. Many have been successful; others have not. CSA must now be about the business of providing every possible assistance to strengthening the overall system. Much of what needs to be done will be achieved by the rationalization of regional office organizations and job descriptions and, more particularly, by the addition of staff at the regional and national levels. CSA's recent "reorganization plan" satisfactorily addresses these current deficiencies. However, supplementary management policies and systems also require special attention. For example:

A. Extension of Authorizing Legislation

CSA must increase the support environment for our grantees by reinforcing the legislative bases for our programs and establishing effective national office linkages with other Federal and private institutions. In addition to the measures indicated in Parts I and II above, there is the specific need for a renewed, multi-year authorization for the agency.

B. Revision of Rules and Regulations

CSA needs to update and refine our grantee rules and regulations to reflect current statutory requirements, OMB requirements, and our and our grantees', experience in working with those that have not changed by statute.

In addition to changes in policies and procedures, CSA especially needs innovations in our financing procedures that will lessen the burden caused by quarterly funding and the current statutory requirement for national office approvals. Such innovations will shortly be ready for implementation.

C. Revision of Grantee Management Systems

CSA will strengthen the management systems by which grantees establish reasonable objectives and against which to be held accountable for managerial and programmatic performance. Key sub-systems now under development include modifications in the grant application process and the installation of an information system that will provide information needed by the grantees themselves. With these systems in place, CSA will be in a position to carry out its responsibility to insure that grantees that do not manage themselves well and that do not satisfactorily impact upon the problems of poverty will be discontinued, in whole or in part, so that funds can be redistributed to those grantees who use resources more effectively.

D. Provision of Training and Technical Assistance

CSA will strengthen the institutional capabilities of its grantees by providing more and better information

and guidance, more effective monitoring, and constructive technical assistance and training to meet the most critical managerial and programmatic needs identified by grantees. Specifically, CSA will assist SEOO's in reaching clearer understandings of their roles--which may differ by state or region--and their accountability to CSA.

Developing Areas of Emphasis for Aiding the Poor  
Targets of Opportunity for CSA

- reform of public assistance policies and practices, so as to insure higher degrees of equity and efficiency without sacrificing incentives for individual and family effort to move away from public dependency;
- more effective means of intervening in the labor market so as to increase possibilities for productive employment, particularly, though not necessarily, in the private sector; primary target groups for such efforts would be the young and disadvantaged who are most severely affected by economic downturns and other victims of invidious discrimination;
- more effective techniques of delivering public and private services to the poor in the interest of expanding access, improving coordination, and increasing efficiency;
- drawing from and building upon experiences with comprehensive economic/<sup>physical</sup> and social development for discrete communities as a particularly promising approach to meeting our nation's objectives. We must, in this regard, pay especial attention to the possibilities for refining and expanding our initiatives with CDC's, orchestrating these efforts more fully with related public programs, and carefully investigating and developing fruitful roles for community action agencies.

Supporting Documents (Part III)

A-1 CSA Blueprint

B-1 Reorganization Request to OMB

B-2 Pattern of Staffing at 1067 Level

B-3 Distribution of on-board staff as of November 20, 1976

B-4 Timetable for Implementation

B-5 CSC Letter on Current Misclassified Positions

C-1 Historical Perspective on Labor-Management Relations





SUMMARY OF REORGANIZATION PLAN OF 7-16-76

The purpose of this Reorganization Plan for the Community Services Administration is to meet the mandate of the Congress as presented in the Economic Opportunity Act of 1964 as amended by the Community Services Act of 1974 and to carry out United States policy. It is designed to promote the better execution of the laws, the more effective management of this executive agency and its functions, and the expeditious administration of the public business. In doing so, it establishes the basis for resolving problem areas and management deficiencies noted in various reports by the Congress, the Civil Service Commission, the National Advisory Council on Economic Opportunity, the General Accounting Office and others. Accordingly, known organizational and functional requirements, problems, and inadequacies were considered in restructuring. The reorganization addresses the following problems:

- a. The need to effectively and adequately restore or establish management processes to perform required functions, including the establishment of new functions against legislative requirements and the restoration of those required functions and procedures which have deteriorated or become defunct.
- b. The current inadequacy of staff which resulted from dismantling efforts and created unequal or "skewed" distribution of staff against workload demands.
- c. The need for the proper expertise in each functional area.
- d. The need to meet Civil Service Commission position management and classification requirements as expressed in evaluation of the Regional Offices.

The proposed organizational structure is designed to group, coordinate, and consolidate functions according to major purpose with the intent of providing quality management while holding down unnecessary expenditures and promoting economy. Unnecessary overlapping and duplication of effort have been eliminated. Proper supervisory positions have been established. The Headquarters organization has been designed to be compatible with like functions in the Regional Offices. More comprehensive details are provided in the summary and the component organization elements of this manual. Highlights of what the new organization provides are as follows:

- a. Improved management capability at all functional levels with particular emphasis on planning, compliance monitoring, evaluation, budgeting, and inter-agency coordination.

- (1) Creates an Office of Plans, Policy and Evaluation which reports to the Director and provides the basis for this particular emphasis. In addition, networks are established with other Headquarters and Regional Offices to make comprehensive planning, monitoring, budgeting, evaluation and inter-agency coordination possible.
- (2) Strengthens the capability of the Office of Economic Development to administer CSA's responsibilities under Title VII, Community Economic Development.
- (3) Clarifies the role of the Office of Community Action (formerly the Office of Operations) in planning, administering, and evaluating CSA programs funded under Title II, Community Action Programs. Provides a focal point for guiding and monitoring the operations of the ten Regional Offices.
- (4) Reorganizes regional offices into ten standardized structures, with comparative manning based on workload, and provides the network by which the Agency plans, implements, monitors and evaluates, and gathers information and data on its programs in the field.
- (5) Restructures the Office of Civil Rights to concentrate on grantee/contractor civil rights compliance while transferring internal equal employment responsibility to the Office of Administration.
- (6) Establishes an Office of Audit and Inspection, which merges Internal Audit, External Audit, and Inspection into one office, with the Office Chief reporting to the Director. This provides the Director with the capability for independent review of the integrity of agency and grantee operations.
- (7) Reorganizes the Office of Administration to consolidate all administrative type functions in one office including the Data Processing Center.
- (8) Streamlines the Controller's function to make possible total concentration on financial planning, programming, budgeting, accounting, and reporting.

- (9) Concentrates the role of the Office of the General Counsel on legal activities and actions involving agency management and operations.
  - (10) Clarifies the roles of the Office of Public Affairs and the Office of Congressional Affairs.
- b. This reorganization plan responds to concerns of the Committee on Government Operations, the Civil Service Commission, and the National Advisory Council on Economic Opportunity by:
- (1) Identifying actual manpower needs against legislative mandates.
  - (2) Identifying specific positions required and determining the specific classification of those positions.
  - (3) Standardizing positions for Regions to provide equity of grade for like jobs.
  - (4) Establishing the base for a national position management program.
- c. The Reorganization Plan provides the basis for improved labor-management relations by bringing order to staffing, position classification, roles and relationships and work distribution.

Legislative Reference: Economic Opportunity Act of 1964 as amended by the Community Services Act of 1974.

Purpose of the EOA of 1964 as Amended: To strengthen, supplement, and coordinate efforts to mobilize the human and financial resources of the nation to combat poverty in the United States.

The Community Services Act: (Public Law 93-644, 93<sup>rd</sup> Congress, H.R. 14449, January 4, 1975) was enacted for the purpose of extending programs under the Economic Opportunity Act of 1964, including Headstart, Community Action, and Economic Development Programs; and to provide for increased involvement of State and Local Governments in antipoverty efforts by authorizing a Community Partnership Program.

Section 601 (a) of the Community Services Act of 1974 established the Community Services Administration within the executive branch as the successor authority to the Office of Economic Opportunity. With this enactment, the Congress gave renewed emphasis to United States policy; to the purpose of the Economic Opportunity Act of 1964; and to the continuing mission of the former Office of Economic Opportunity.

Mission Statement: The mission of the Community Services Administration is to develop and implement a national strategy to stimulate improved focusing of human and financial resources on the goal of eliminating poverty. This effort is carried out by working with and through key public and private institutions at the national, state and local levels.

A major part of the CSA mission is to stimulate and assist State and Local grantees to be effective agents of change in the quantity and quality of resource mobilization to fight poverty. The purpose is carried out from the national level by providing financial assistance, basic policy direction, information and guidance, training and technical assistance. Through negotiation, demonstration, technical assistance, joint arrangements, and delegation of programs with evaluation of results, CSA encourages Federal policies and programs which are more responsive to the needs of the poor and the mobilization efforts of local Community Action Agencies and Community Development Corporations. Assistance in building the capacity of poor people's organizations is a major functional responsibility of CSA, with the cooperation and assistance of other Federal agencies.

Today there are 865 multi-purpose Community Action Agencies in the United States, including Alaska, Hawaii, Puerto Rico, Virgin Islands, and the Pacific Trust-Territories. In addition, several hundred Delegate Agencies sponsored by CAAs have extended the program network so that the total number of agencies involved ranges into the thousands. 770 CAAs are private corporations chartered in their respective States and 95 CAAs are State or Local government-administered public agencies. CAA jurisdictions of service cover more than 70% of all counties in the United States. CAAs directly employ approximately 100,000 full- and part-time employees.

## HISTORICAL PERSPECTIVE

Over ten years ago, with the enactment of the Economic Opportunity Act of 1964, the President and the Congress of the United States proclaimed a national "War on Poverty" and gave birth to the Office of Economic Opportunity within the Executive Office of the President. That Agency responded to a national purpose, policy and mission which remains unchanged today but which is given new emphasis by the enactment of the Community Services Act. Given the National social climate of the 1960's the Agency moved rapidly to develop and implement the programs directed by sections of the Act.

### National Emphasis Programs

As a result, between 1964 and 1968 key major programs to meet national needs were funded. These became known as "National Emphasis" or "Special Programs." Essentially they were demonstrations or pilot efforts to combat poverty problems in education, training, job opportunities, health, housing, welfare, agricultural services, both across the Nation and on Indian Reservations. As a result, such major programs as Job Corps, Vista, Headstart, Follow-Through, Upward Bound, Foster Grandparents, Comprehensive Health Services, Neighborhood Centers, Family Planning, Drug Rehabilitation, Alcoholic Counseling and Recovery, Migrant and Seasonal Farmworkers, Native Americans, and Legal Services Programs were launched. These programs have subsequently been transferred to other Federal agencies.

### Community Participation

The key element that evolved from implementation of the EOA (Economic Opportunity Act) was the concept of a local role for a citizen-based institution to mobilize in a unified way Federal, State and other resources in an attack on poverty. The Congress determined that local community citizens should identify their own poverty-related problems and be involved in stimulating a better focusing of all available local, state, private and Federal resources upon eliminating poverty. The goal was to enable low income families and low income individuals of all ages, in rural and urban areas, to attain skills, knowledge and motivations and secure opportunities needed for them to become fully self-sufficient. Title II of the EOA provided for the establishment of Community Action Agencies (CAAs) throughout the Nation.

The CAA has become an eligible agency to receive other Federal funds. It broadened community contact with the Federal Government and, in fact, provided the means for an improved network system of delivery, distribution and feed-back with great potential for problem identification, research and development, program operation monitoring, program evaluation, and information and intelligence gathering for many Federal, State and Local agencies.

### Broad Role for CSA

This broadened role for Community Action Agencies at the Community level in turn broadens the role and responsibility of the Community Services Administration, as the parent organization of the Community Action Agencies. It broadens the Congressional mandate on this Agency to carry out the purpose of the EOA, the policy of the United State and the Agency's specific mission. This is particularly true in this Agency's responsibility for Federal interagency coordination and evaluation of Federal programs which feed through Community Action Agencies to the poor. The same applies on a Regional basis for coordination with states on state programs. In addition, there needs to be CAA, Regional and national agency coordination and cooperation with private foundations and business and industry in resource mobilization and specific program efforts.

### Evaluation

This broadened role was anticipated and recognized by the Congress in Title IX, "Program and Project Evaluation," of the EOA as amended by the Community Services Act of 1974. Section 901 (2) of the Act states "the Director shall, directly or through grants or contracts, measure and evaluate the impact of all programs authorized by this Act and of poverty-related programs authorized by other Acts." This makes obvious the need for horizontal communication, coordination and cooperation at the Federal level and for the same requirement vertically to states, local governments and Community Action Agencies. The additional specific roles of the Community Action Agency are:

"...the better organization of a range of services related to the needs of the poor, so that these services may be more effective and efficient in helping families and individuals overcome particular problems in a way that takes account of, and supports, their progress in overcoming related problems."

The impact of this statement placed on OEO and places on CSA as the primary Federal evaluator, the responsibility of not only evaluating the effectiveness of individual Federal poverty-related programs but also of the overall Federal, State, and local success in bringing Americans out of poverty.

### Erosion

While ties with Community Action agencies were being strengthened, national emphasis programs began to be spun-off but without replacement programs or monies. The Legal Services Program became a political football in a game that lasted for five years. By 1972, the Community Action Agencies, other OEO grantees, and the staff of the Agency itself sensed that a slow but sure erosion of effort was taking place.

### Dismantling and System Disintegration

By the end of 1971, erosion appeared more like obliteration and in January of 1973, overhanded actions were taken to demolish the agency and its programmatic efforts. Without notification to the Congress, a new Director was placed in charge. His stated mission was to dismantle the agency. He moved quickly to remove or set aside political appointees relating to the previous Director. He obtained special authority from the Civil Service Commission to bring in Consultants, "Special Temporaries," and additional Schedule "C" appointees. He established "Special" jobs and parallel positions to carry out the mission as he then saw it. Accordingly, he set aside career Civil Servant managers and supervisors and replaced them with the special appointees. The immediate result was that established system almost instantly fell apart and continuity of effort came to an abrupt end.

### Creation of the Position Management Problem

In addition, the Director decided that whenever a position was vacated it would be automatically abolished. This started the immediate destruction of the Agency manning table that normally reflected authorized staffing and identified positions required to operate the agency in all programmatic areas and in the Regional Offices. He also announced his intention to abolish the Regional Offices. During February and March of 1973, plans were set in motion to spin-off the "National Emphasis" program to other agencies by June 30 of 1973. By April 1, Regional staff had been informed of reduction-in-force actions against them. Those employees that left were not replaced. Systems continued to fall apart, work areas became uncovered or were picked up by someone else in an effort to maintain coverage. During the period there were major losses of staff with technical and professional expertise and heavy loss in secretarial skills.

During this same period Community Action Agencies were informed they would be given monies to function to June 30. This caused chaos in the field. Staffs scrambled for jobs elsewhere in the community. Relationships with other agencies programs funded through the CAA became confused, and, as a result, the system disintegration disease now covered the Nation.

### Dismantlement Halted

By legal action in the courts, the dismantling effort was stopped, declaring the appointment and actions of the new Director as illegal. A new Director was appointed and nominated.

### Vacant Positions Ignored

However, severe damage had already been done to the operational capability of the Agency, particularly in the Regional Offices and in the Community Action Agencies. Unlike the Community Action Agencies which,

once funding was restored, were able to rebuild staffs, programs, and processes, Federal OEO found itself ending up a victim of spin-off planning. It was considered that the agency would go out of business by June 30, 1973 and that its "on-board" strength would be approximately 1,500. This figure did not take into account the 525 vacant positions that existed at the time the Agency was forced to the ceiling of 1,500. The existence of these vacancies might have been made moot if the demolition plan had been carried out. However, OMB did, in fact, apply a ceiling of 1,482 positions to OEO at the end of fiscal year '73. The Agency entered into FY '74, its last year under its legislation, living from month to month on continuing resolutions, badly mangled from the demolition attempt, with a need for 2,025 people to restore its operational capabilities and process, but with a new personnel ceiling of 1,482, a shortage of 543.

#### "Spin-off"

Plans to transfer National Emphasis programs to other agencies continued in effect, and in August and September 1973, 474 program and program support employees were transferred to other agencies. The agency was then left with a ceiling of 1,008 against a manpower need of 1,551, (the 543 vacant positions).

#### 1006--A Residual Ceiling

In late 1973, a personnel ceiling of 1,006 was formally placed on the agency. The ceiling of 1,006 for FY '74 was derived from an on-board strength of 1,006 positions occupied by permanent employees during September 1973. This newly imposed ceiling again failed to recognize 545 (1,551-1,006) vacant positions in existence at that time. The net effect was to lock in the organization at current 1,006 on-board strength. This fixed the staffing in Headquarters and each Region based on existing filled positions. The types of encumbered positions remained varied from Region to Region. Any semblance of standardization in the structure and capability of the Regional Offices was no longer identifiable.

#### Creation of the Position Classification Problem

An additional problem of locking in the Agency at the 1,006 was that it created the appearance of overgraded jobs in the Regions by not acknowledging the previously existing vacant positions and their relationship to the encumbered positions that remained. This condition was further aggravated by the need for those individuals remaining to attempt to absorb some of the duties and functions relating to the required but abolished vacant positions. Since the positions remaining encumbered varied from Region to Region the absorption of duties of vacant positions varied, and the end result was to create position management and classification problems throughout the Nation.



### Continuation

So while Community Action Agencies were recovering and regaining strength, OEO continued to flounder, manacled with an overly restricted ceiling, a remaining staff that was skewed in distribution across the country, inadequate to meet its mandated mission and functions and to operate the systems and processes that were required. It remained in this state of benign neglect, looking for legislation to run out on June 30, 1974, but hoping for new legislation for FY '75.

June 30, 1974 arrived with no new legislation. However, the agency was given added life by the Congress through continuing resolutions and continued to function as best it could. When the House and also the Senate surfaced legislation, the Agency commenced planning for implementation of any of the possible versions of pending legislation.

### Quarterly Funding

In FY 1974, Congress provided only \$185 million in local initiative funds which were sufficient to refund the Community Action Agencies (CAAs) only through June 30, 1974. This in turn meant that all of the CAAs required refunding on July 1, 1974. A series of continuing resolutions since then has meant that funds drawn down quarterly from Treasury had to be used to fund all CAAs for three months rather than one-fourth of the CAA for twelve months.

Consequently, an unusual timing variance exists between our programs. Community action, our basic program delivery system, is funded currently on a quarterly basis, causing inevitable funding delays, while our categorical programs, such as economic development, are funded basically in June of each fiscal year for twelve to twenty-four months in advance. Consequently, we intend to concentrate our timing obligations during the transition quarter on local initiative (Section 221) grantees. This will enable the authorization of all section 221 grantees with budget of \$300,000 or less, comprising 75% of our community action grantees. This timing concentration on smaller grantees will greatly ease the regional administrative problem, resulting in faster service for the larger grantees we are unable to annualize. All categorical programs, such as energy, nutrition, demonstrations and economic development will continue to be funded on at least an annual basis at 1976 appropriation levels well into fiscal 1977.

During this period, the Agency again received a change of directors, the new Director being confirmed in December of 1974.

### New Legislation

In its passage of the Community Services Act of 1974 the Congress has indicated that the needs of the poor for a Federal Agency advocate and for solutions to their needs can still be met by the Community Services Administration as a successor to OEO. Funds were appropriated and the act was implemented.

### Unchanged Ceiling

The Agency's authorized personnel ceiling remained at 1,006. The Agency however drew together selected personnel as task forces to study and make recommendations for implementation of the Community Services Act. But little or no action was taken by Agency personnel in the early part of 1975, although Section 601 (e)(1) of the Community Services Act stated that after March 15, 1975 the President might submit to the Congress a Reorganizational Plan which would, in effect, split and transfer the Agency into HEW and the Department of Commerce. In addition, the Legal Services Act already provided for transfer of the Legal Services Program to a new Legal Services Corporation. Under these circumstances, it appeared the ball still wasn't in this Agency's court.

### Reorganization

With the President's commitment to retain CSA as an independent agency we have moved accordingly to reorganize and reconstitute. The senior staff, including Regional Directors, were drawn together as a Task Force to study the Community Services Act and plan for the organizational structure, functional areas, and specific functions required to be carried out. The basic needs of the Agency reorganization effort were laid out:

1. The requirement to implement the new Act.
2. The requirement for a clear mission statement.
3. The requirement for a sound organizational structure.
4. The requirement for clear-cut functional areas.
5. The requirement for sound position management practices.
6. The existing problem of skewed staffing and the need to identify balanced staffing requirements.
7. The need for work measurement data for positions according to functional areas.
8. The need for standardized position classifications for like jobs.
9. The need to restore or develop new management, administrative, and fiscal processes.
10. The need for clear-cut executive, operational, technical and administrative channels.

### Standardized Regions

One of the key features emerging was a standardized prototype Regional Office. Its purpose was to lay the base for restoring policies, processes, and procedures on a national basis and to restore the networks by which the Agency delivers its programs and obtains feed-back.

### Determining True Staffing

The Agency then moved to determine its true staffing requirements against the organization and functions which had been developed. It

gathered work measurement data, either in terms of existing data or in terms of logical projections. This data was then converted to manpower needs. In addition, logical ratios of supervision and clerical support were used. The end result was to "fine-tune" the organization and establish its required manning.

#### Zero Base

It was by this method that the Agency, starting from a zero base, arrived at a logical staffing level of 1,196, which bore no direct relation to its arbitrarily developed budgetary ceiling nor to what would have been its true ceiling after spin-off of delegated programs, as previously discussed.

#### External Criticism

During the period of these phases of reorganization the Agency came under heavy criticism from the Manpower and Housing Sub-committee of the House Committee on Government Operations, for alleged personnel abuses in CSA. Hearings were conducted in July and September 1975. In looking into alleged personnel abuses, the Committee became heavily involved in the organizational and staffing programs of the Agency. The Committee found that CSA had "inherited a fragmented organizational structure left over from the attempted dismantling of the Office of Economic Opportunity...Employee performance and morale have declined".

It also found that "CSA's role as an advocate of the poor within the Federal Government has generally broken down because of uncertainty over whether the President will transfer the Agency to the Department of HEW. CSA's failure to reorganize and improve its performance has contributed to his breakdown".

The Committee recommended; "The Community Services Administration should reorganize itself without further delay to correct unrealistic personnel ceilings, overgraded jobs, and maldistribution of workload".

The Committee also noted the comments of the National Advisory Council on Economic Opportunity, with regard to the personnel ceiling for CSA as indicated in the Council's eighth annual report of June 30, 1975; "No detailed analysis or review of the personnel ceiling allocated to the Agency by the Office of Management and Budget (OMB) has been undertaken to determine whether the Community Services Administration is adequately staffed to handle its mandated responsibilities. Also, the OMB document supporting the President's budget request for fiscal year 1976 neither determines nor reflects a viable personnel ceiling for a new Agency mandated to undertake a broad range of functions".

"The Advisory Council found that the personnel ceiling of 1,006 permanent and 100 special positions allocated to the Agency by OMB does not take into account the CSA legislation enacted January 4, 1975. In fact

this allocation was arbitrarily carried over from the Office of Economic Opportunity as it was operated during its period of dismantlement...The Council respectfully recommends a reasonable personnel ceiling for the Community Services Administration."

Also, during the period of reorganization planning, the Agency received a series of personnel management evaluations from four Civil Service Commission regions. In April of 1975, the CSA San Francisco Region was evaluated. In August, 1975, the Kansas City and Dallas Regional Offices were evaluated, and in September, the Chicago Regional Office was evaluated.

The combined result of these evaluations was to indicate severe position management and classification problems in the four regions. The San Francisco CSC stated:

"Our review of the state of the Region's position classification program found that it reflected the effects of contraction suffered by the Agency resulting from the January 1973 notice of closure and ensuing imposition of manpower ceiling restrictions."

"The phase-out or 'limbo' status of the Agency during the past two years has resulted in staff reductions that have left an imbalance of positions in the Region's workforce".

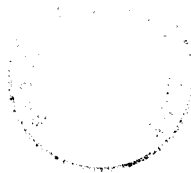
"The Region has continued to attempt to meet its continuing clerical needs through the hiring of temporary employees. As management is aware, this situation is causing an abuse of the temporary appointment authority to fill continuing positions".

The St. Louis CSC Regional Office in evaluating CSA's Kansas City Region pointed out personnel management inadequacies and position management problems. The Commission stated:

"Staff losses contributed to organizational and classification problems".

The Dallas CSC Regional Office indicated:

"In 1973, the decision was rendered to close the Office of Economic Opportunity (OEO), the Agency to which CSA is the successor organization. The decision was subsequently overturned. However, the fallout from the proposed closure has been significant, a decrease in employees, with total employment going from approximately 138 at the end of FY 1972 to 78 in August of 1974".



"Because of the scheduled abolishment of OEO in 1973, the Agency lost a majority of its clerical employees. One result of this loss of employees and of present ceiling restrictions has been the improper use of temporary appointments to fill continuing positions".

The Chicago CSC Region indicated that since its last visit in October 1972, "OEO...now CSA...has faced an uncertain future. The personnel ceiling was reduced from about 150 employees in 1972 to 95 at the end of 1975." The uncertain status, i.e., possible abolishment of OEO/CSA caused the agency to go into a holding pattern.

Another agency also entered the scene during the reorganization planning period. The General Accounting Office surveyed the San Francisco and Chicago Regional Offices to determine organizational effectiveness. While its report has not yet been issued, debriefings in the Regional Offices and preliminary briefings at Headquarters on conclusions and findings point to weaknesses in organizational effectiveness, particularly in the grantee evaluation area.

In summary, the Manpower and Housing Subcommittee of the House Committee on Government Operations, the National Council on Economic Opportunity, four Civil Service Commission Regional Offices, and the General Accounting Office, surfaced on a formal basis those organizational, staffing, and effectiveness problems that the Agency had already identified for itself.

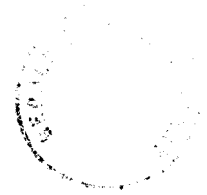
Because of the complexity of these problems, the decision was made to start from a zero base and reconstitute the Agency.

#### Classification of Positions - New Organization

During the latter part of 1975 and early 1976, the Agency concentrated on identifying, describing, and classifying the specific job descriptions required to implement the reorganization. Standardized position descriptions were written and classified for each position in the proposed standardized Regional Offices. In the Headquarters, office heads were asked to submit position descriptions for each position or group of positions in the new organization proposed for their offices. The objective was to identify every position in the reorganized Agency by title, grade, and series. This would provide the Agency with a new manning table and provide the basis for dealing with previously identified position management and misclassification problems.

#### Coordination with the Civil Service Commission

On a national basis, the Agency negotiated with the Civil Service Commission for technical assistance in implementation of the reorganization and on setting aside the corrective action required by the specific case studies in each Regional CSA evaluation of our Regions. The Director of



the Agency called for CSC to conduct an evaluation of all CSA Regional Offices and the CSA Headquarters. The Commission responded that it did not have the resources to meet our request. It suggested we had sufficient information in the four evaluations to identify problems throughout all regions. The Agency agreed. However, it pointed out that the four evaluations were on "remnant" jobs, being performed in different manners in different regions according to the whims of the current incumbent or the philosophy of the local Regional Director.

It further pointed out that this was the case throughout the country and that the jobs being described and performed in varying manners, degrees of expertise, philosophies and understandings, did not necessarily reflect the manner in which the Agency wanted the workload carried out.

The Agency presented its reorganization and implementation plan, and its regional standardized positions to the Commission and requested approval to implement this plan in lieu of responding to the corrective actions required by the evaluations. The Agency pointed out that to take corrective action on the evaluations would require a reduction-in-force, which would be followed by a reorganization that would require an additional reduction-in-force action. It would impose a "double-whammy" situation on personnel affected in those particular regions. It would not be equitable to have this occur in four regions while the other six would be affected by the reorganization. The Commission consulted with its regional offices on June 17, 1976, agreed to delay issuance of classification certificates requiring action on the positions that had been reviewed, and agreed to allow the Agency to carry out its original plan to implement a reorganization.

#### New Director

On April 16, 1976, a new Director was appointed to the Agency. After being briefed on the background and history of the reorganization plan, he mandated that it be reviewed and adjusted as necessary to meet the following criteria:

- . It should be relevant to the mission and the purpose of the Act.
- . It should be managerially sound.
- . It should be complete
  - (a) Relate to the Legislative mandates.
  - (b) Satisfactorily address all components.
  - (c) Be cohesive and provide for interagency relations.
  
- . Be understandable and uncomplicated.
- . Be defensible and saleable.
- . Be flexible and able to meet contingencies.
- . Delineate authorities and lines of authority.



## REORGANIZATION FEATURES OF KEY SIGNIFICANCE

The Community Services Administration will undergo reorganization in order to: correct inadequate staffing needs; correct skewed staffing resulting from dismantling efforts and transfer of programs; align the Agency's responsibilities with the Community Services Act of 1974 and otherwise provide for a more orderly structure to respond effectively to its mission.

Significant modifications described in this manual treat the problems inherent in an Agency fraught with serious and ineffective organizational and structural situations. These same concerns have been addressed by the Manpower and Housing Subcommittee, chaired by Congressman Floyd V. Hicks. On completion of a series of hearings conducted by the Committee, recommendations were issued in the final report. Consideration is given to these recommendations in this reorganization effort.

The U.S. Civil Service Commission, in responding to allegations of mismanagement and other organization problems, has likewise advised the CSA to take immediate steps to correct conditions associated with improper staffing and classification, and to assign duties and responsibilities to personnel commensurate with the Agency's statutory and administrative mandates.

Additional recommendations from GAO focused on a specific program area. The necessity to develop and implement national strategies for the conduct and administration of special programs is considered in the staffing levels requested.

The National Advisory Council similarly discovered severe deficiencies in CSA's structure and staffing and has issued strong recommendations for a thorough review and analysis of CSA's staffing needs and organizational structure in order to improve the administrative and communication functions of the Agency.

In addition to addressing staffing needs and position management and classification requirements, major organizational changes which will be implemented are:

### (1) OFFICE OF POLICY, PLANNING AND EVALUATION

A new office of Policy, Planning, and Evaluation is established to provide the Director with specific staff responsible for the overall development and coordination of Agency planning, policy, and evaluation efforts including development of strategies and model agreements for insuring greater coordination with other Federal agencies.

Currently Agencywide planning is virtually nonexistent. "Planning" is done on a helter-skelter basis as specific programs get to critical funding stages. In addition, evaluations have not yet been systematized nor has the Agency developed the capability to carry out its mandate under Title IX of the Community Services Act.

This office will provide the Agency with the capability to develop and coordinate an evaluation structure and annual plan, principally for those programs currently administered by CSA itself. In addition this office will coordinate a CSA-wide Research Program, develop and manage an agency-wide forward planning process, identify policy vacuums, and develop special policy studies on overall Agency strategy. A significant role is the development of strategies and model agreements for insuring greater coordination with other Federal agencies at the national level. (An example of this type of effort is reflected at Appendix A.)

(2) REGIONAL OFFICES

One of the key features of the reorganization is the establishment of standardized Regional Office structures. Its purpose is to set the base by which the Agency can establish and implement policies, processes and procedures on a national basis. It also establishes the networks by which the Agency delivers its programs and obtains feedback. It will tie the Agency more effectively with its grantees and provide better communication and accountability. Each region will have a planning and budget capability by which it can keep the Headquarters informed on the best use of available resources as relate to their particular Regional problems. It also provides each Regional Director with an evaluation component by which the region can enforce the Agency's "standards of effectiveness" at the grantee level. Each Region's field operations unit will be strengthened to provide for adequate monitoring of grantee operations. In addition, the standardized Regional Office structure provides the basis by which the Agency's "skewed" staffing, position management, and position classification problems can be corrected. It also provides the basis on which a national personnel management evaluation system can be established.

(3) OFFICE OF PROGRAM MANAGEMENT

Formerly the CSA Office of Operations, this office has been reorganized to fulfill the responsibilities mandated by the Community Services Act of 1975, and the priorities of the Director, CSA.

The new structure replaces one which has existed since 1972. It will provide for the orderly, efficient planning, administration and evaluation of programs authorized under Title II Of the Act. Internal management will be strengthened by giving the Associate Director the ability to supervise and coordinate the functions of the ten Regional Offices and the Offices Headquarters units.



To assist the Associate Director in managing the variety of activities which are his responsibility, the critical planning and budget capability has been added in a Planning, Policy, Budget and Regional Coordination Division. Within this same unit are assigned the Office's policy initiation and development function, and that of Regional coordination. This latter function is most important to assure the best possible administration of an Agency whose activities span the entire country. Tasks such as ensuring regional follow-up on Inspection reports and audits are to be performed here, together with provision of assistance to the Regional Offices in their dealings with Headquarters offices.

Program monitoring and development functions are to be handled by the new Special Programs Division. Management flexibility for meeting changing Agency and legislative priorities is provided by clustering the Division's Program Specialists in six program groups supervised by Senior Program Coordinators. As workloads shift from one program area to another, positions and people will be moved to adjust to the load.

A Program Evaluation Division has been established to restore a most essential function which has virtually atrophied within CSA - evaluation. The evaluation process is vital to ensure that every dollar spent is used most productively. This Division will also work with program developers to establish goals for individual projects at the time they are funded, together with the evaluation criteria to be applied to the projects.

(4) OFFICE OF ECONOMIC DEVELOPMENT

The Office of Economic Development (OED) has been modified to better administer CSA's program responsibilities under Title VII. These include financial assistance for (1) community development corporations (CDCs) under the Special Impact Program authorized by Part A (grants), (2) low-income rural families and cooperatives under Part B (grants and loans), (3) a rural development loan fund and a community development loan fund under Part C (loans), and (4) technical assistance, planning grants, evaluation and research under Part D (grants and contracts). OED is also responsible for mobilizing and coordinating the provision of other Federal agency resources for Title VII programs.

OED is currently funding 40 CDCs, serving both urban and rural low-income communities, under Part A. The funding of a small number of new CDC planning grants this summer, to which CSA is already publicly committed under an application and review process initiated early in FY 1976, will increase the number of CDCs to around 45. In addition, OED is administering six special support grants under Part D. Research and evaluation grants now being negotiated will increase this number to approximately 10 support projects.

OED's CDC projects are all unique community-controlled institutions, undertaking comprehensive community development programs which involve a combination of business development, housing and physical development, and supportive social services. The CDCs are whole or part owners of some 250 community business ventures, a number which will grow over time as the CDCs mature. These 45 CDCs, once operational, are each funded for two-year periods with grants ranging from \$1 to \$9 million, including both administrative and venture capital funds.

OED's ten support projects include a wide variety of activities which also impose a heavy and highly specialized requirement for effective monitoring and management. These projects include policy research, legal and programmatic technical assistance, specialized demonstration programs providing incentives for the raising of private capital and guaranteeing loans, demonstration projects testing out new models for the implementation of economic development to meet special community needs, and evaluation of project and program effectiveness.

OED is also responsible, aside from its own funding authorities, for working closely with other Federal agencies such as the Small Business Administration, Department of Commerce (Economic Development Administration, Office of Minority Business Enterprise), Department of Housing and Urban Development, and the Department of Agriculture, to insure the availability to Title VII grantees of the staff and financial resources of these other agencies.

(5) OFFICE OF AUDIT AND INSPECTION

The establishment of an Audit and Inspections Office will concentrate both internal and external audit requirements and inspections into one unit. This unit will be placed in a line position to the Director. This will provide the Director with an audit and investigating arm to gather factual information that will assist in planning, directing, coordinating, and controlling Agency operations. Currently these functions are contained in three separate units of the Agency.

(6) OFFICE OF CIVIL RIGHTS

The realignment of the Office of Civil Rights is to more effectively and expeditiously address grantee complaints and grievances. In addition, an EEO Officer and an EEO Director will be designated for the purpose of providing greater accessibility to Agency employees on internal EEO problems and concerns.

Currently these responsibilities have all been vested in the Human Rights Office of the Agency. The revised plan separates the internal EEO responsibilities and places them more logically in the Office of Administration under an EEO Officer. The Deputy Director of the Agency will be designated the Agency's EEO Director.

(7) THE OFFICE OF ADMINISTRATION

The Office of Administration is reorganized to restore CSA administrative systems and processes which had in many instances become shattered or nearly non-existent. Chief among these are the following:

1. A Management and Systems organization to design and implement new systems and restore processes and procedures that have deteriorated or become defunct, among them the CSA management information system;
2. Establishment and maintenance of a Manpower Management and Personnel structure that will develop and maintain:
  - a. A national position management system
  - b. A personnel evaluation system
  - c. A national position classification program
3. Restoration and reinstatement of a full records management system to control reports, forms, publications and printing in accordance with Federal administrative, retention and custodial standards.
4. Establishment and staffing of an adequate telecommunications management support system.
5. In the area of organizational streamlining and restructuring, the following changes and improvements are being made:
  - a. The Internal Audit Division has been removed from this Office and consolidated with External Audit and Inspection into a more logical and potentially more effective Office of Audit and Inspection.
  - b. ADP (Automatic Data Processing) is transferred from the Office of the Controller to the Office of Administration to be more closely linked with the Management and Systems design and development functions for responsiveness to the operational and management information needs of all Regional and Headquarters offices.
  - c. ADP is internally reorganized and streamlined, reducing from its previous four branches to two. This reduces the ratio of supervisory to technical operating personnel and provides a basis for updating and modernizing the data processing systems with the Agency.

- d. Grantee and CSA property and facility management functions, previously divided between two divisions in this Office, are here consolidated into one for improved coordination.

(8) OFFICE OF THE CONTROLLER

The Office of the Controller is organized to direct the CSA financial management functions in the areas of financial planning, programming, budgeting, accounting and reporting. The Controller represents the Director in negotiations on budgetary, fiscal and accounting matters with the Office of Management and Budget, Congressional Committees, General Accounting Office, Department of the Treasury and other agencies of the Federal Government.

Originally organized to include the ADP (Automatic Data Processing) and External Audit functions, the office has now been streamlined to make possible total concentration in the financial management areas.

In addition to the removal of the ADP and Audit functions, internal organization restructuring has also been accomplished. The Financial Management Division, gutted by a loss of 42 positions over the past three years, had dropped in professional accounting proficiency and was left with a residue of generalists in the grant processing area. To correct this, and to strengthen the Division, the Financial Policies, Procedures and Payroll Division is abolished. Three current systems accountant positions plus two new accountant positions will materially strengthen the Agency accounting function and balance the ratio of professional to generalist. (Payroll becomes a branch of this division).

Similarly, the Program Analysis Division which, in 1973, contained sixteen positions now is attempting to perform the Program Analysis and Budget functions with six positions. This professional staff is being increased by two in order to strengthen the Agency's programming and budgeting process. As part of the Agency's central budget office, these program analysts will complement the efforts of budget analysts in providing in-depth monitoring, reviews, evaluations and cost studies of activities conducted by the program offices. These analysts will also provide essential input to the Agency's Appropriation and Authorization justification process and prepare special analyses as required.

(9) OFFICE OF GENERAL COUNSEL

Originally organized to include the Inspection functions of the Agency, the Office of General Counsel has now been streamlined from four divisions to three. Removal of Inspection leaves an organization that will exclusively concern itself with the provision of legal advice, guidance and counsel to Agency officials and staff.

Through its staff of attorneys in Headquarters and Regional Counsels in the ten Regional Offices, it will handle all legal activities and actions involved in Agency management and operations, litigations and negotiations, claims, court actions and legal interpretations of statutes, decisions, executive orders, administrative rulings and directives.

One of the divisions is newly added to direct its attention to all legal aspects of Agency personnel administration and labor-management relations.

(10) OFFICE OF PUBLIC AFFAIRS

Formerly organized in a rather unnatural relationship with the functions of Congressional liaison, the Office of Public Affairs is now established as a separate streamlined office to inform the public on the story of the Community Services Administration - how and what it is doing to help the poor, what the poor are doing to help themselves, how local people are aiding their disadvantaged neighbors and what the other members of the community can do to make local Community Action programs successful.

The Public Affairs organization directs its effort to mobilize resources for antipoverty programs, encourage institutional responsiveness to the poor and gain acceptance for participation of the poor in community action for the eradication of poverty.

(11) OFFICE OF CONGRESSIONAL AFFAIRS

Formerly associated with the Public Affairs organization and functions of the Agency, the streamlined Office of Congressional Affairs is now established to devote itself solely to the concerns of relationships with the Congress and Congressional needs and actions as they relate to CSA.

In its assigned capacity this Office will serve as the Agency's principal liaison with Members of Congress and their Committee staff. They are to advise the Director and Agency officials on the status of proposed and pending legislation and appropriations affecting CSA. They are to draft, coordinate and approve all Congressional correspondence, provide grant announcements to Members of Congress and disseminate to Congress requested Agency publications, Federal Outlays Reports and CSA instructions.

(12) LABOR-MANAGEMENT RELATIONS

An organizational base for improved labor-management relations has been provided by creation of a Labor Relations Branch within the Office of Administration and a Labor Management and Personnel Division with the Office of General Counsel. The reorganization plan further addresses many of the underlying problems which past events have created in the work distribution and position classification areas. This reorganization provides the basis for ensuring that all positions are properly classified and that "like type" positions are equitably classified. In particular, this base is set through the standardized Regional Office structure. The reorganization will also place staff into properly classified jobs against a published manning table, so that all will know which positions exist, which are management, which are bargaining unit, what positions are vacant, what the career ladders are, etc., and in general resolve and respond to many questions that have led to Labor-Management problems in the past.

REORGANIZATION PROGRESS 7-16-76 TO PRESENT

The plan which was presented to the Office of Management and Budget on July 16, 1976 provided for a requested ceiling of 1,186 positions. This composite request was substantially in excess of the 900 positions CSA had been instructed to work down to. In the case of some portions of the Agency functions, especially in administrative support, this fact held down the estimate of required positions to a bare minimum, no effort being made to estimate the start-up efforts needed to restore long-shattered systems. In other words, the 1,186 positions requested were considered to be an absolute requirement to fulfill the mission of the Agency.

The response to the request, while considerably more than the previously stated ceiling, fell 119 short of the need and established a ceiling of 1,067. This required that the Agency distribute the shortage by means of re-reorganizing where the change might either help some functions or, in other cases, do the least damage to the Agency's potential effectiveness or completeness of functioning.

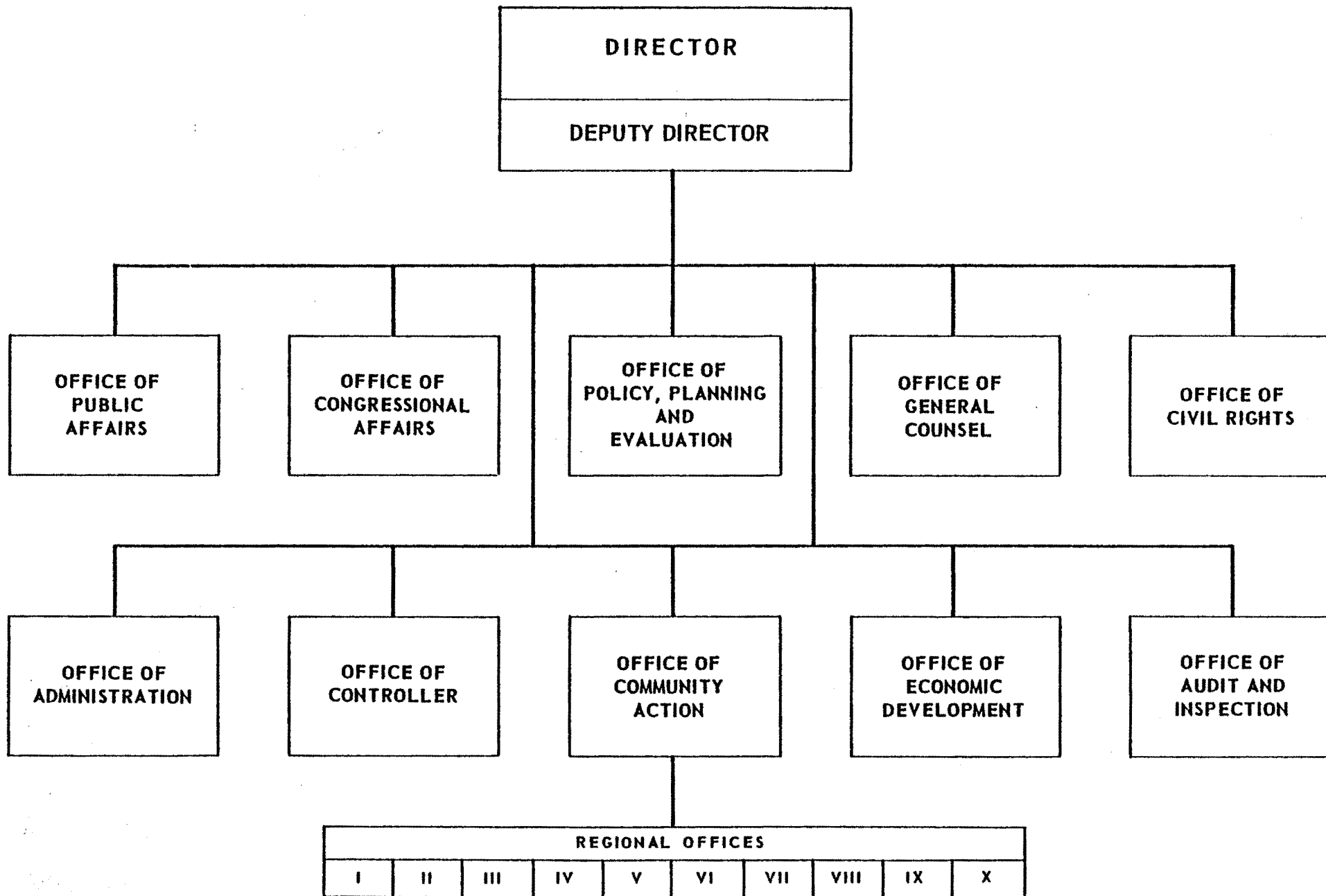
The resultant revised structure was established and officially announced to the CSA Office Heads and Regional Directors on October 28, 1976. The structure was detailed to position titles and numbers of each by Office, Division and Branch and was accompanied by a detailed 3-page reorganization implementation plan and schedule. The attached 3-page Gantt chart provides the definition of all key implementation tasks to be performed. While there has been some minor slippage of actual work against this schedule, the majority of the actions are proceeding as planned, pointed toward possible completion during April 1977.

# Community Services Administration

WASHINGTON, D.C. 20506

ORGANIZATIONAL CHART AND FUNCTIONAL STATEMENTS  
11-19-76

COMMUNITY SERVICES ADMINISTRATION





COMMUNITY SERVICES ADMINISTRATION

OFFICE OF THE DIRECTOR

The mission of the Community Services Administration is to develop and implement a national strategy to stimulate improved focusing of human and financial resources on the goal of eliminating poverty. This effort is carried out by working with and through key public and private institutions at the national, state and local levels.

A major part of the CSA mission is to stimulate and assist State and local grantees to be effective agents of change in the quantity and quality of resource mobilization to fight poverty. This purpose is carried out from the national level by providing financial assistance, basic policy direction, information and guidance, technical assistance, joint arrangements, and delegation of programs with evaluation of results, CSA encourages Federal policies and programs which are more responsive to the needs of the poor and the mobilization efforts of local Community Action Agencies and Community Development Corporations. Assistance in building the capacity of poor people's organizations is a major functional responsibility of CSA, with the cooperation and assistance of the Federal agencies.

## OFFICE OF PUBLIC AFFAIRS

Formerly organized in a rather unnatural relationship with the functions of Congressional liaison, the Office of Public Affairs is now established as a separate office to inform the public on the story of the Community Services Administration - how and what it is doing to help the poor, what the poor are doing to help themselves, how local people are aiding their disadvantaged neighbors and what the other members of the community can do to make local Community Action programs successful.

The tools used by the Office of Public Affairs are unique to their mission. They include established and maintenance of press relations, meeting of deadlines and scheduling of release timings, news releases, interviews and news conferences, radio, television, photography, newsletters, speeches, convention displays and meeting arrangements.

The Public Affairs organization directs its effort to mobilize resources for antipoverty programs, encourage institutional responsiveness to the poor and gain acceptance for participation of the poor in community action for the eradication of poverty.

## OFFICE OF CONGRESSIONAL AFFAIRS

Formerly associated with the Public Affairs organization and functions of the Agency, the Office of Congressional Affairs is now established to devote itself solely to the concerns of relationships with the Congress and Congressional needs and actions as they relate to CSA.

In its assigned capacity this Office will serve as the Agency's principal liaison with Members of Congress and their Committee staff. They are to advise the Director and Agency officials on the status of proposed and pending legislation and appropriations affecting CSA. They are to draft, coordinate and approve all Congressional correspondence, provide grant announcements to Members of Congress and disseminate to Congress requested Agency publications, Federal Outlays Reports and CSA instructions.

OFFICE OF POLICY, PLANNING AND EVALUATION

A new Office of Policy, Planning and Evaluation is established to provide agency-wide guidance and direction for the Community Services Administration by receiving recommendations for agency policy and goals from the Assistant and Associate Directors and Regional Directors, coordinates these recommendations with findings derived from evaluations, agency program reviews, and provides the Director with a coordinated policy and evaluation recommendation.

Communicates and implements the Director's policy and goals by providing guidance to major Headquarters and regional offices in the development of their respective statements, implementing procedures, and program guidances.

Provides the Director or his Deputy with coordinated and authoritative recommendations on the substance of current and anticipated anti-poverty legislations. Coordinates the development of agency-wide research demonstration (R&D) program plans.

Insures that agency management systems provide appropriate, current and valid anti-poverty data required for policy development and planning.

Develops Agency Planning issuances, planning guidance and assumptions, and prescribes planning formats and schedules to be used agency-wide.

Develops and monitors and agency-wide evaluation structure, plan, and the evaluation process required to accomplish national impact evaluation, program strategy evaluation and grantee efficiency evaluation.

Coordinates interagency evaluation efforts with the Intergovernmental and Private Sector Relations Staff.

Insures that results of evaluations are incorporated into agency policy and planning activities. Conducts, or sponsors, Program Impact Evaluations unilaterally or jointly with other Federal agencies.

Provides technical assistance and staff development resources for evaluation activities to major Headquarters and Regional offices.

Reviews Agency evaluation reports for quality control, prescribes format, and schedules for evaluation reports and arranges for the dissemination and utilization of evaluation information by CSA and external agencies ranging from Congressional Committees to CSA grantees.

Prepares for the Director and transmits to the Congress, the annual report of Agency evaluation activity, as well as reports and summaries of individual reports as required under Title IX, Community Services Act.

Provides liaison, support and development for agency intergovernmental and private sector relationships and activities designed to enlist the support and participation of Federal agencies administering anti-poverty program, states and local governments, and the private sector, in CSA programs.

Insures effective representation for the Agency on interagency Task Forces and Committees dealing with anti-poverty activities, including Undersecretaries Group. Reviews agency activities involving the Undersecretaries Working Group, and SEOO project designs and funding matters.

Reviews grants and contracts funded and administered by other Agency offices to state and local Governments and associations of public officials for consistency with CSA policy, legislative mandate and program priorities.

Serves as liaison on behalf of the agency to the National Advisory Council on Economic Opportunity.

OFFICE OF GENERAL COUNSEL

Originally organized to include the Inspection functions of the Agency, the Office of the General Counsel has now been streamlined from four divisions to three. Removal of Inspection leaves an organization that will exclusively concern itself with the provision of legal advice, guidance and counsel to Agency officials and staff.

Through its staff of attorneys in headquarters and Regional Counsels in the ten Regional Offices, it will handle all legal activities and actions involved in Agency management and operations, litigations and negotiations, claims, court actions and legal interpretations of statutes, decisions, executive orders, administrative rulings and directives.

One of the divisions is newly added to direct its attention to all legal aspects of Agency personnel administration and labor-management relations.

## OFFICE OF CIVIL RIGHTS

The primary responsibility of this office is to ensure non-discrimination in employment and delivery of services in CSA-funded programs and delegate agencies of CSA-funded programs, pursuant to Title VI, Secs. 601-605 of the Civil Rights Act of 1964; Title VI, Sec. 624 of the Economic Opportunity Act of 1964, as amended; and Regulations of the Office of Economic Opportunity under 45 C.F.R. Part 1010.

This office acts on behalf of the Director of the Agency in ensuring that no financial assistance will be granted to any program under the Act (EOA) where there is cause to believe that such program is discriminatory in its operations. Where discriminatory practices are found to exist, the office recommends remedial actions ranging from grant conditioning, to suspension, to termination.

Carrying out that responsibility involves receiving, investigating (via the Inspection Division), issuing findings and attempting conciliation in complaints from employees or applicants for employment with CSA-funded programs and complaints of denial of benefits to recipients of CSA-funded programs for discriminatory causes.

The Office of Civil Rights is responsible for designing and implementing a program for preventive compliance including conducting pre-grant reviews, periodic compliance reviews of grantee practices, monitoring grantee affirmative action programming, training, assisting and guiding grantee personnel to insure equal opportunity for all persons, and for correcting deficiencies in employment practices and delivery of services to the poor.

This office shares with other Federal agencies a joint responsibility for all aspects of equal opportunity practices in CSA grantees and delegate agencies and coordinates with the appropriate agencies and agency personnel to ensure that end.

## THE OFFICE OF ADMINISTRATION

The Office of Administration is reorganized to restore CSA administrative systems and processes which had in many instances become shattered or nearly non-existent. Chief among these are the following:

1. A Management and Systems organization to design and implement new systems and restore processes and procedures that have deteriorated or become defunct, among them the CSA management information system.
2. Establishment and maintenance of a Manpower Management and Personnel structure that will develop and maintain:
  - a. A national position management system
  - b. A personnel evaluation system
  - c. A national position classification program
3. Restoration and reinstatement of a full records management system to control reports, forms, publications and printing in accordance with Federal administrative, retention and custodial standards.
4. Establishment and staffing of an adequate telecommunications management support system.

In the area of organizational streamlining and restructuring, the following changes and improvements are being made:

1. The Internal Audit Division has been removed from this office and consolidated with External Audit and Inspection into a more logical and potentially more effective Office of Audit and Inspection.
2. ADP (Automatic Data Processing) is transferred from the Office of the Controller of the Office of Administration to be more closely linked with the Management and Systems design and development functions for responsiveness to the operational and management information needs of all Regional and Headquarters offices.
3. ADP is internally reorganized and streamlined, reducing from its previous four branches to two. This reduces the ratio of supervisory to technical operating personnel and provides a basis for updating and modernizing the data processing systems within the Agency.
4. Grantee and CSA property and facility management functions, previously divided between two divisions in this Office, are here consolidated into one for improved coordination.
5. An EEO Staff is established to handle the processing of internal complaints of discrimination.



## OFFICE OF THE CONTROLLER

The Office of the Controller is organized to direct the CSA financial management functions in the areas of financial planning, programming, budgeting, accounting and reporting. The Controller represents the Director in negotiations on budgetary, fiscal and accounting matters with the Office of Management and Budget, Congressional Committees, General Accounting Office, Department of the Treasury and other agencies of the Federal Government.

Originally organized to include the ADP (Automatic Data Processing) and External Audit functions, the office has not been streamlined to make possible total concentration in the financial management areas.

In addition to the removal of the ADP and Audit functions, internal organization restructuring has also been accomplished. The Financial Management Division, gutted by a loss of 42 positions over the past three years, had dropped in professional accounting proficiency and was left with a residue of generalists in the grant processing area. To correct this, and to strengthen the Division, the Financial Policies, Procedures and Payroll Division is abolished. Three current systems accountant positions plus two new accountant positions will materially strengthen the Agency accounting function and balance the ratio of professional to generalist. (Payroll becomes a branch of this division.)

Similarly, the Program Analysis Division which, in 1973, contained sixteen positions now is attempting to perform the Program Analysis and Budget functions with six positions. This professional staff is being increased by two in order to strengthen the Agency's programming and budgeting process. As part of the Agency's central budget office, these program analysts will complement the efforts of budget analysts in providing in-depth monitoring, reviews, evaluations and cost studies of activities conducted by the program offices. These analysts will also provide essential input to the Agency's Appropriation and Authorization justification process and prepare special analyses as required.

## OFFICE OF COMMUNITY ACTION

Formerly the CSA Office of Operations, this office has been reorganized to fulfill the responsibilities mandated by the Community Services Act of 1975, and the priorities of the Director, CSA.

The new structure replaces one which has existed since 1972. It will provide for the orderly, efficient planning, administration and evaluation of programs authorized under Title II of the Act. Internal management will be strengthened by giving the Associate Director the ability to supervise ten Regional Offices and the Office's Headquarters units.

To assure better control of Agency policy development, planning and evaluation by the Director of CSA, Program Management's activities in these areas will be coordinated under the proposed Office of Policy, Planning and Evaluation.

To assist the Associate Director in managing the variety of activities which are his responsibility, the critical planning and budget capability has been added in a Planning, Policy, Budget and Regional Coordination Division. Within this same unit are assigned the Office's policy initiation and development function, and that of Regional coordination. This latter function is most important to assure the best possible administration of an Agency whose activities span the entire country. Tasks such as ensuring regional followup on Inspection reports and audits are to be performed here, together with provision of assistance to the Regional Offices in their dealings with Headquarters offices.

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The last unit restores a most essential function which has virtually atrophied within CSA - evaluation. The process is vital to ensure that every dollar spent is used most productively. This Division will also work with program developers to establish goals for individual projects at the time they are funded, together with the evaluation criteria to be applied to the projects.

## REGIONAL OFFICES

One of the key features of the reorganization is the establishment of standardized Regional Office structures. Its purpose is to set the base by which the Agency can establish and implement policies, processes and procedures on a national basis. It also establishes the network by which the Agency delivers its programs and obtains feedback. It will tie the Agency more effectively with its grantees and provide better communication and accountability. Each region will have a planning and budget capability by which it can keep the Headquarters informed on the best use of available resources as relates to their particular regional problems. It also provides each Regional Director with an evaluation component by which the region can enforce the Agency's standards of effectiveness at the grantee level. Each region's field operations unit will be strengthened to provide for adequate monitoring of grantee operations. In addition, the standardized Regional Office structure provides the basis by which the Agency's "skewed" staffing, position management, and position classification problems can be corrected. It also provides the basis upon which a national personnel management evaluation system can be established.

## OFFICE OF ECONOMIC DEVELOPMENT

The Office of Economic Development (OED) is organized to administer CSA's program responsibilities under Title VII, Community Economic Development, of the Community Services Act of 1974. These include financial assistance for (1) community development corporations (CDCs) under the Special Impact Program authorized by Part A (grants), (2) low-income rural families and cooperatives under Part B (grants and loans), (3) a rural development loan fund and a community development loan fund under Part C (loans), and (4) technical assistance, planning grants, evaluation and research under Part D (grants and contracts). OED is also responsible under Part D for mobilizing and coordinating the provision of other Federal agency resources for Title VII programs.

OED is currently funding 40 CDCs, serving both urban and rural low-income communities, under Part A. The funding of a small number of new CDC planning grants this summer, to which CSA is already publicly committed under an application and review process initiated early in FY 1976, will increase the number of CDCs to around 45. In addition, OED is administering six special support grants under Part D. Research and evaluation grants now being negotiated will increase this number to approximately 10 support projects.

OED's CDC projects are all unique community-controlled institutions, undertaking comprehensive community development programs which involve a combination of business development, housing and physical development, and supportive social services. The CDCs are whole or part owners of some 250 community business ventures, a number which will grow over time as the CDCs mature. These 45 CDCs, once operational, are each funded for two-year periods with grants ranging from \$1 to \$9 million, including both administrative and venture capital funds.

OED's ten support projects include a wide variety of activities which also impose a heavy and highly specialized requirement for effective monitoring and management. These projects include policy research, legal and programmatic technical assistance, specialized demonstration programs providing incentives for the raising of private capital and guaranteeing loans, demonstration projects testing out new models for the implementation of economic development to meet special community needs, and evaluation of project and program effectiveness.

OED is also responsible, aside from its own funding authorities, for working closely with other Federal agencies such as the Small Business Administration, Department of Commerce (Economic Development Administration, Office of Minority Business Enterprise), Department of Housing and Urban Development, and the Department of Agriculture, to insure the availability to Title VII grantees of the staff and financial resources of these other agencies.

## OFFICE OF AUDIT AND INSPECTION

Newly created, the Office of Audit and Inspection is a consolidation of three divisions formerly located in three separate offices. Merged are External Audit from the Office of the Controller, Internal Audit from the Office of Administration, and Inspection from the Office of General Counsel.

The basis for consolidation of these units is that they are investigative and review activities which have as their primary objective the acquisition of factual information and analyses for management's use in planning, directing, coordinating and controlling Agency operations. While the audit and inspection functions have some inherent differences in orientation and function they do complement each other in support of managerial review, evaluation and decision-making.

Removal of audit from the financial arm of the organization provides for improved objectivity and independence in the review of Agency financial matters. Consolidation into a single audit authority of the previously separate "external" audit of grantees and contractors, and the "internal" audit of CSA's own operations and controls is designed to strengthen the professional performance of the function and streamline its management.

This change is in accord with practice among many of the Federal Executive agencies and recommendations received from OMB. The structure in a separate office of the Agency provides for mutual exchange and support among professional auditors and inspectors in the areas of greatest need at any given time - internal or external. It ensures a free flow of audit and inspection information and increases coordination of audit and inspection work and interrelated findings.

This Office now becomes the focal point for independent review of the integrity of Agency operations, the central authority concerned with the quality, coverage and coordination of the audit, investigation and security services of the Agency, and the principal advisors to the Director on these matters.



# Community Service Administration

U.S. GOVERNMENT PRINTING OFFICE: 1975

**OGT 28 1976**

## MEMORANDUM

**SUBJECT: Reorganization Plan for 1,067 Positions**

**TO: All Office Heads and Regional Directors**

Attached for your information and appropriate action is the identification of the 1,067 positions to be used in the Agency reorganization. By separate memorandum you were furnished a copy of the reorganization implementation plan.

As indicated in the plan, the next big hurdle is the matching of already classified position descriptions to the 1,067 positions and making modifications or writing new position descriptions as required. In the Headquarters, the Personnel Division will coordinate with office heads in the match-up of position descriptions to Headquarters positions and will coordinate required modifications or development of new position descriptions.

In the case of the Regions, tentative classification criteria for Field Representative (CAP Specialist) assignments has been developed and is being coordinated with the Civil Service Commission. The criteria is being furnished to all Regions and will be used in determining classification of Field Representatives (CAP Specialist) positions. Regions will use prototype positions to complete their manning tables. Specific instructions on utilization of criteria and other information will be furnished Regions by separate memorandum.

The Management Systems Staff, Office of Administration, will be coordinating revisions of functional statements with office heads so that staffing and functions will be compatible. Functional statements for Regions will be coordinated with Angel Rivera's office. The objective is to publish a revised organization manual, according to schedule.

Regions should commence space planning now so that any negotiations with GSA can be started as early as possible. The Administrative Services Division, Office of Administration will assist Regions on request. Administrative Services will also plan basic Headquarters layout and will coordinate with office heads on specific office layouts. Related actions, such as



telephone changes, records movements, property and equipment changes, and moving logistics planning should also start now.

If you have any questions, please call me on 254-5330.

*Alphonse Rodriguez*  
Alphonse Rodriguez  
Associate Director for  
Administration

cc: AFGE  
Grade Review Board

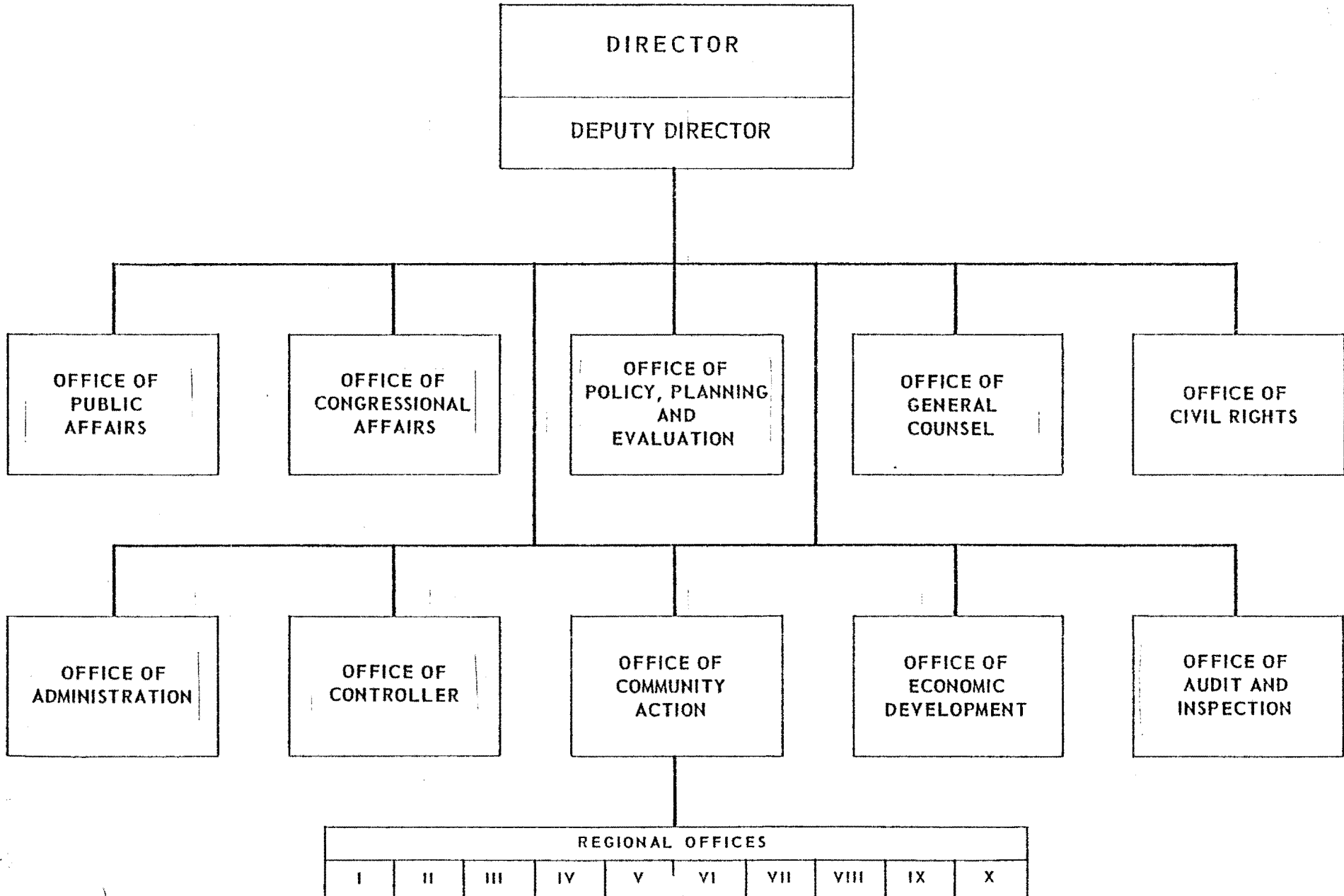


ORGANIZATIONAL MANUAL  
COMMUNITY SERVICES ADMINISTRATION

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COMMUNITY SERVICES ADMINISTRATION



COMMUNITY SERVICES ADMINISTRATION  
SUMMARY OF STAFFING REQUIREMENTS

<u>HEADQUARTERS</u>	<u>STAFF REQUIRED</u>
Director's Office	8
Policy, Planning and Evaluation	16
Community Action	58
Economic Development	41
Administration	104
Controller	42
Audit and Inspection	48
General Counsel	23
Civil Rights	6
Congressional Affairs	5
Public Affairs	<u>5</u>
<u>HEADQUARTERS TOTAL</u>	356
<u>REGIONAL OFFICES TOTAL</u>	707
NATIONAL ADVISORY COUNCIL	<u>4</u>
<u>TOTAL AGENCY</u>	1,067

OFFICE OF THE DIRECTOR

TOTAL STAFF - 8

Director and Executive Office

# Positions

Director  
Deputy Director  
Special Assistant  
Confidential Secretary (Steno)  
Clerk-Typist

1  
1  
2  
2  
2

TOTAL 8

OFFICE OF POLICY, PLANNING AND EVALUATION

TOTAL STAFF - 16

Office Of Associate Director

# Positions

Associate Director

1

Secretary (Typing)

1

TOTAL 2Policy Analysis Division

Chief

1

Policy Analysis Specialist

2

Program Planning Specialist

1

Secretary (Typing)

1

TOTAL 5Evaluative Research Division

Chief

1

Evaluative Research Specialist

3

Secretary

1

TOTAL 5Intergvt. and Pri. Sector Relations Div.

Chief

1

Intergovernmental Relations Specialist

1

Private Sector Relations Specialist

1

Secretary

1

TOTAL 4

OFFICE OF COMMUNITY ACTION

TOTAL STAFF - 58

<u>Associate Director and Staff</u>	<u># Positions</u>
Associate Director	1
Deputy Associate Director	1
Administrative Officer	1
Program Specialist	1
Secretary (Typing)	1
TOTAL	<u>5</u>
<u>Program Management Division</u>	
<u>Chief and Staff</u>	
Chief	1
Secretary (Typing)	1
TOTAL	<u>2</u>
<u>Planning and Budget Branch</u>	
Chief	1
Specialist	4
Secretary (Typing)	1
TOTAL	<u>6</u>
<u>Policy and Procedures Branch</u>	
Chief	1
Specialist	3
Secretary (Typing)	1
TOTAL	<u>5</u>
<u>Regional Coordination Branch</u>	
Chief	1
Specialists	5
Secretary (Typing)	1
Clerk-Typist	1
TOTAL	<u>8</u>
<u>Special Programs Division</u>	
Chief	1
Program Specialist	18*
Secretary (Typing)	1
Clerk-Typist	4
TOTAL	<u>24</u>
* Community Food and Nutrition	- 3
Energy	- 5
Housing - Rural	- 3
Manpower/Employment/Migrant	- 3
Senior Opportunities and Services	- 2
Special Projects	- 2
<u>Program Evaluation Division</u>	
Supervisory Program Evaluator	1
Program Evaluator	4
Statistical Analyst	1
Clerk-Typist	2
TOTAL	<u>8</u>

<u>REGIONAL OFFICES</u>	<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>	<u>6</u>	<u>7</u>	<u>8</u>	<u>9</u>	<u>10</u>	<u>TOTALS</u>
	<u>BOS</u>	<u>NY</u>	<u>PHIL</u>	<u>ATL</u>	<u>CHI</u>	<u>DAL</u>	<u>KC</u>	<u>DEN</u>	<u>SF</u>	<u>SEA</u>	
<u>OFFICE OF THE REG. DIR.</u>											
Director	1	1	1	1	1	1	1	1	1	1	10
Deputy Director	1	1	1	1	1	1	1	1	1	1	10
Secretary	2	2	2	2	2	2	2	2	2	2	20
Regional Counsel	1	2	1	2	2	1	1	1	1	1	13
Fed. Regional Council	1	1	1	1	1	1	1	1	1	1	10
Civil Rights Officer	2	2	2	2	2	2	2	2	2	2	20
Public Affairs Officer	1	1	1	1	1	1	1	1	1	1	10
Clerical	2	2	2	2	2	2	2	2	2	2	20
<u>TOTAL</u>	<u>11</u>	<u>12</u>	<u>11</u>	<u>12</u>	<u>12</u>	<u>11</u>	<u>11</u>	<u>11</u>	<u>11</u>	<u>11</u>	<u>113</u>
<u>OPERATIONS DIVISION</u>											
Supervisors	2	3	3	5	5	3	2	1	2	2	28
CAP Specialists	14	20	18	35	34	26	12	8	14	10	191
CAP Assistants	2	3	3	5	5	3	2	1	2	2	28
Clerical	4	6	6	10	10	6	4	2	4	4	56
<u>TOTAL</u>	<u>22</u>	<u>32</u>	<u>30</u>	<u>55</u>	<u>54</u>	<u>38</u>	<u>20</u>	<u>12</u>	<u>22</u>	<u>18</u>	<u>303</u>
<u>PLANS, BUDGET &amp; EVALUATION DIV.</u>											
Planning	1	1	1	1	1	1	1	1	1	1	10
Secretary	1	1	1	1	1	1	1	1	1	1	10
Program Specialists	3	3	3	3	3	3	3	3	3	3	30
Evaluators	3	4	4	6	6	5	3	2	3	2	38
Budget Analyst	1	1	1	1	1	1	1	1	1	1	10
Clerical	1	1	1	2	2	2	1	1	1	1	13
<u>TOTAL</u>	<u>10</u>	<u>11</u>	<u>11</u>	<u>14</u>	<u>14</u>	<u>13</u>	<u>10</u>	<u>9</u>	<u>10</u>	<u>9</u>	<u>111</u>
<u>ADMINISTRATION DIVISION</u>											
Chief	1	1	1	1	1	1	1	1	1	1	10
Secretary	1	1	1	1	1	1	1	1	1	1	10
Accounting Officer	1	1	1	1	1	1	1	1	1	1	10
Systems Accountant	2	2	2	4	4	3	1	1	2	1	22
Acct/Tech-Voucher Exam.	1	1	1	1	1	1	1	1	1	1	10
Grants Mgmt. Supervisor	0	0	0	1	1	1	0	0	0	0	3
Senior Processing Clerk	1	1	1	0	0	0	1	1	1	1	7
Grants Processing Clerk	2	2	2	4	4	3	1	1	2	1	22
Personnel Officer	1	1	1	1	1	1	1	1	1	1	10
Personnel Technician	1	1	1	1	1	1	1	1	1	1	10
Supply Mgmt. Officer	1	1	1	1	1	1	1	1	1	1	10
Property Specialists	1	1	1	1	1	1	1	1	1	1	10
Clerical	4	5	4	6	6	5	4	4	4	4	54
<u>TOTAL</u>	<u>17</u>	<u>18</u>	<u>17</u>	<u>23</u>	<u>23</u>	<u>20</u>	<u>15</u>	<u>15</u>	<u>17</u>	<u>15</u>	<u>180</u>
<u>REGIONAL TOTALS</u>	<u>60</u>	<u>73</u>	<u>69</u>	<u>104</u>	<u>103</u>	<u>82</u>	<u>56</u>	<u>47</u>	<u>60</u>	<u>53</u>	<u>707</u>

OFFICE OF ECONOMIC DEVELOPMENT

TOTAL STAFF - 41

Office of the Assoc. Director

# Positions

Assoc. Director	1
Deputy Assoc. Director	1
Secretary	1
TOTAL	<u>3</u>

Planning, Management & Evaluation Division

Chief	1
Secretary	1
TOTAL	<u>2</u>

Planning & Evaluation Branch

Chief	1
Evaluation Specialist	1
Research Specialist	1
Secretary	1
TOTAL	<u>4</u>

Management Branch

Chief	1
Audit Specialist	1
Program Assistant	2
Clerk-Typist	1
TOTAL	<u>5</u>

Program Operations Division

Chief	1
Secretary	1
TOTAL	<u>2</u>

Economic Development Branch

Chief	1
Economic Development Specialist	10
Clerk(Typing)	2
TOTAL	<u>13</u>

Business Analysis Branch

Chief	1
Business Analysts	9
Clerk(Typing)	2
TOTAL	<u>12</u>



OFFICE OF ADMINISTRATION

TOTAL STAFF - 104

<u>Office of the Director</u>	#	<u>Positions</u>
Associate Director		1
Deputy Associate Director		1
Administrative Assistant		1
Secretary (Typing)		1
	TOTAL	<u>4</u>
 <u>Equal Employment Opportunity Staff</u>		
Supv. Equal Employment Specialist		1
Equal Employment Specialist		1
Program Coordinator		2
Clerk-Typist		1
	TOTAL	<u>5</u>
 <u>Manpower Management &amp; Personnel Division</u>		
<u>Chief and Staff</u>		
Director of Personnel		1
Senior Position Classification Specialist		1
Secretary (Typing)		1
	TOTAL	<u>3</u>
 <u>Position Classification &amp; Career Devl. Branch</u>		
Supv. Posi. Class. & Career Devl. Spec.		1
Senior Posi. Classification Spec.		1
Senior Career Development Spec.		1
Position Classification Specialist		1
Career Development Specialist		1
Personnel Clerk (Typing)		1
	TOTAL	<u>6</u>
 <u>Labor Relations Branch</u>		
Supv. Labor-Mgmt. Relations Spec.		1
Senior Labor-Mgmt. Relations Spec.		1
Labor-Mgmt. Relations Spec.		3
Personnel Clerk (Typing)		1
	TOTAL	<u>6</u>
 <u>Staffing &amp; Employee Relations Branch</u>		
Supv. Personnel Mgmt. Spec.		1
Senior Personnel Mgmt. Spec.		2
Employee Relations Specialist		1
Personnel Staffing Specialist		1
Personnel Assistant		1
Personnel Clerk (Typing)		3
	TOTAL	<u>9</u>

OFFICE OF ADMINISTRATION CONT.

<u>Management &amp; Systems Division</u>	<u># Positions</u>
Supervisory Management Analyst	1
Management Analyst	2
Computer Systems Analyst	1
Secretary (Typing)	1
TOTAL	<u>5</u>

Administrative Services DivisionChief and Staff

Office Services Manger	1
Fiscal Specialist	1
Correspondence Clerk	2
Secretary (Typing)	1
TOTAL	<u>5</u>

Paperwork & Printing Management Branch

Supervisory Management Analyst	1
Records Management Specialist	1
Publications & Reports Specialist	1
Printing Specialist	1
Warehouse Foreman	1
Stockman	2
Clerk-Typist	1
TOTAL	<u>8</u>

Property & Management Services Branch

Property & Office Services Supv.	1
Office Services Specialist	3
Property Management Specialist	1
Communications Specialist	1
Commications Operator	1
Mail/File Clerk	3
Clerk-Typist	1
TOTAL	<u>11</u>

Library Branch

Supervisory Librarian	1
Librarian	1
Library Technican	1
TOTAL	<u>3</u>

Automatic Data Processing DivisionChief and Staff

Digital Computer Systems Administrator	1
Secretary/Stenographer	1
Clerk-Typist	1
TOTAL	<u>3</u>

OFFICE OF ADMINISTRATION CONT.

<u>Software and Standards Branch</u>	<u># Positions</u>
Supervisory Computer Specialist	1
Computer Systems Specialist	1
Computer Specialist	1
Computer Programmer	9
TOTAL	<u>12</u>
<u>Operations Branch</u>	
Supervisory Computer Specialist	1
Computer Specialist (Shift Supervisor)	2
Computer Services Specialist	1
Computer Planner	1
Computer Specialist	4
Computer Operator	1
Peripheral Equipment Operator	1
Computer Technician	7
Computer Tape Library Technician	1
TOTAL	<u>19</u>
<u>Procurement Division</u>	
Supervisory Contract Specialist	1
Contract Specialist	2
Procurement Specialist	1
Clerk-Typist	1
TOTAL	<u>5</u>

OFFICE OF THE CONTROLLER

TOTAL STAFF - 42

Controller and Staff

# Positions

Controller	1
Deputy Controller	1
Administrative Officer	1
Secretary (Typing)	1
TOTAL	<u>4</u>

Program Analysis Division

Chief - Budget Officer	1
Budget Analyst	3
Program Analyst	2
Secretary (Typing)	1
TOTAL	<u>7</u>

Financial Management Division

Chief and Staff

Chief - Accounting Officer	1
Deputy - Accounting Officer	1
Systems Accountant	2
Secretary (Typing)	1
TOTAL	<u>5</u>

Fiscal Settlements Branch

Supv. Operating Accountant	1
Operating Accountant	1
Fiscal Specialist	2
Accounting Specialist	2
Grant Fiscal Specialist	3
Voucher Examiner	1
Clerk-Typist	2
TOTAL	<u>12</u>

Accounting Operations Branch

Supv. Operating Accountant	1
Operating Accountant	2
Accountant	2
Accountant Assistant	1
Accounting Technician	1
Clerk-Typist	1
TOTAL	<u>8</u>

Payroll Branch

Supv. Fiscal Specialist	1
Fiscal Specialist	1
Payroll Technician	4
TOTAL	<u>6</u>

OFFICE OF AUDIT AND INSPECTION

TOTAL STAFF - 48

Chief and Staff

# Positions

Associate Director  
Administrative Assistant  
Secretary (Typing)

1  
1  
1  
TOTAL 3

Audit Operations Division #1

Supervisory Auditor (HDQ)  
Auditor (In Regions)  
Secretary (Typing) 1 each in 5 Regions  
\* Boston 2  
Atlanta 2  
Chicago 2  
Kansas City 1  
Denver 1

1  
8\*  
5  
TOTAL 14

Audit Operation Division #2

Supervisory Auditor (HDQ)  
Auditor (In Regions)  
Secretary (Typing) 1 each in 5 Regions  
\*\* New York 2  
Philadelphia 2  
Dallas 2  
San Francisco 2  
Seattle 1

1  
9\*\*  
5  
TOTAL 15

Internal Audit Operation Division

Supervisory Auditor  
Auditor  
(Clerical work to be provided by the Audit  
Chief's Office)

1  
3  
TOTAL 4

Inspection Division

Supervisory Investigator  
Investigator  
Secretary (Typing)  
Clerk-Typist

1  
9  
1  
1  
TOTAL 12

TOTAL STAFF - 23

General Counsel and Staff

# Positions

General Counsel	1
Deputy General Counsel	1
Administrative Officer	1
Legal Research Analyst	1
Secretary (Typing)	2
TOTAL	<u>6</u>

Legal Mngmt. and Operations Division

Supervisory Attorney - Advisor	1
Staff Attorney	3
Secretary (Typing)	1
Clerk-Typist	1
TOTAL	<u>6</u>

Litigation Division

Supervisory Attorney -Advisor	1
Staff Attorney	3
Secretary (Typing)	1
Clerk-Typist	1
TOTAL	<u>6</u>

Labor Mngmt. and Pers. Division

Supervisory Attorney - Advisor	1
Staff Attorney	3
Secretary (Typing)	1
TOTAL	<u>5</u>

OFFICE OF CIVIL RIGHTS

TOTAL STAFF - 6

Office of Director

Associate Director  
Secretary  
Equal Employment Specialist

	<u># Positions</u>
	1
	1
	4
TOTAL	<u>6</u>

OFFICE OF CONGRESSIONAL AFFAIRS

TOTAL STAFF - 5

Office of the DirectorAssociate Director

Legislative Specialist

Congressional Inquiry Specialist

Secretary (Typing)

# Positions

1

1

2

1

TOTAL 5



OFFICE OF PUBLIC AFFAIRS

TOTAL STAFF - 5

Office of the Director

Associate Director

Public Information Specialist

Writer/Editor

Secretary (Typing)

1

2

1

1TOTAL 5