



Governor Kim Reynolds  
Lt. Governor Adam Gregg  
San Wong, Director

## **NOTICE OF PUBLIC INSPECTION AND PUBLIC HEARING**

### **IOWA COMMUNITY SERVICES BLOCK GRANT PROGRAM**

DES MOINES – Iowans have an opportunity to inspect and comment on Iowa's proposed FFY 2022-2023 Community Services Block Grant (CSBG) State Plan and Application.

The purpose of the federal CSBG Program is to provide assistance to states and local communities, working through a network of community action agencies and other neighborhood-based organizations, for the reduction of poverty, revitalization of low-income communities, and the empowerment of low-income families and individuals in rural and urban areas to become fully self-sufficient. The Iowa Department of Human Rights, Division of Community Action Agencies (DCAA) administers Iowa's CSBG Program and is authorized by Iowa law to contract and distribute Iowa's CSBG Program funds to Iowa's community action agencies.

The proposed application will be available on the DCAA's website (<https://humanrights.iowa.gov/dcaa/csbgs/csbgs-resources>) through August 10, 2021. The inspection and comment period are from July 26, 2021, through August 10, 2021. All comments must be e-mailed to the following DCAA address prior to August 11, 2021, to be considered:

E-mail Address: [dcaa@iowa.gov](mailto:dcaa@iowa.gov)  
Subject: Comments – CSBG State Plan

A virtual public hearing on the proposed application will be held from 9:00 – 10:00 a.m. on August 11, 2021. A link to the public hearing will be posted on the DCAA's website at least 20 minutes prior to the public hearing start time.

The proposed application is subject to change based on comments received and regulations from the U. S. Department of Health and Human Services.

**FFY 2022-2023 IOWA CSBG STATE PLAN AND APPLICATION**  
**(Model State Plan Sections)**

**SECTION 1 – CSBG Administrative Information**

- This section includes the DCAA's and ICAA's contact information.

**SECTION 2 – State Legislation and Regulation**

- This section includes our State's CSBG laws and administrative rules.

**SECTION 3 – State Plan Development and Statewide Goals**

- This section includes the DCAA's mission, responsibilities, goals, and the DCAA's State Plan development process.
  - The DCAA's goals: Distribution of Funds, Monitoring, and Communication (3.2)
  - The DCAA's State Plan development process (3.3 – 3.4a)
  - The DCAA's State Plan development management adjustment (ACSI) (3.4b)
  - The DCAA's performance target for agency overall satisfaction (ACSI) (3.5)

**SECTION 4 – CSBG Hearing Requirements**

- This section includes how the DCAA conducted the State Plan public inspection and public hearing, and also includes information about the latest legislative public hearing (appropriating federal funds made available from federal block grants).

**SECTION 5 – CSBG Eligible Entities**

- This section includes a list of our State's community action agencies and their contact information.
  - Information about the HACAP/Operation: New View merger (5.3c)

**SECTION 6 – Organizational Standards for Eligible Entities**

- This section includes our State's adopted CSBG organizational standards and our State's CSBG organizational standards requirements and assessment processes.
  - Our State's CSBG organizational standards assessment processes (6.3 – 6.3a)
  - Percentage of agencies the DCAA expects to meet all of the CSBG organizational standards (6.5)

**SECTION 7 – State Use of Funds**

- This section includes our State's CSBG allocation formula, planned allocation of funds, and processes for distributing CSBG funds.
  - Our State's CSBG allocation formula description (7.1 – 7.1a)
  - Our State's planned FY 2022 and FY 2023 CSBG agency allocations (7.2)
  - Our State's process for distributing and allocating funds (7.3 – 7.3a)
  - The DCAA's distribution of funds management adjustment (ACSI) (7.5)

**SECTION 8 – State Training and Technical Assistance**

- In this section States describe how they plan to use their CSBG discretionary funds or CSBG administration funds to provide targeted T&TA to their State's agencies. This is the first year States are to report planned CSBG administration funded targeted T&TA in this section.
  - NEW - The DCAA's planned CSBG administration funded targeted T&TA (8.1, 8.1a, 8.1b, and 8.3)
  - NEW - The DCAA's CSBG administration funded T&TA management adjustment (ACSI) (8.4)

#### SECTION 9 – State Linkages and Communication

- This section includes descriptions of the DCAA's linkages and communication activities.
  - How the DCAA coordinates with the agencies and ICAA (9.8)
  - The DCAA's Communication Plan (9.9)
  - The DCAA's communication plan management adjustment (ACSI) (9.11)

#### SECTION 10 – Monitoring, Corrective Action, and Fiscal Controls

- This section includes the DCAA's monitoring schedule, our State's monitoring policies and procedures (including corrective action, TAPs, and QIPs), and the DHR's fiscal controls and audit review procedures.
  - Our State's monitoring policies and procedures (10.2 – 10.6)
    - See the CSBG Policies and Procedures Manual attachment for the specific monitoring policies/procedures
  - The DCAA's monitoring procedures management adjustment (ACSI) (10.14)

#### SECTION 11 – Eligible Entity Tripartite Board

- This section includes our State's tripartite board policies and requirements.

#### SECTION 12 – Individual and Community Income Eligibility Requirements

- This section includes our State's CSBG eligibility requirements for clients and community-targeted services.
  - Iowa's CSBG program income eligibility threshold for client services is 125% (12.1 – 12.1a)

#### SECTION 13 – Results Oriented Management and Accountability (ROMA) System

- This section includes our State's ROMA adopted measurement system and our State's ROMA policies and procedures.
  - How the DCAA supports agencies in using ROMA (13.3)
  - How the DCAA secures a CSBG application and community needs assessment from each agency (13.5 - 13.6)

#### SECTION 14 – CSBG Programmatic Assurances and Information Narrative

- This section includes descriptions for how our State addresses the federal CSBG Act assurances.

#### SECTION 15 – Federal Certifications

- This section includes our State's agreements/certifications to the federal Lobbying, Drug-Free Workplace, Debarment, and Smoking/Tobacco requirements.

# Iowa Community Services Block Grant Program

## **FFY 2022-2023 COMMUNITY SERVICES BLOCK GRANT STATE PLAN AND APPLICATION**

Community Services Block Grant Program  
Division of Community Action Agencies  
Iowa Department of Human Rights  
Lucas State Office Building – 2nd Floor  
Des Moines, Iowa 50319  
Phone: (515) 281-3861 • Fax: (515) 242-6119

**SECTION 1**  
**CSBG Administrative Information**

**1.1.** Identify whether this is a one-year or a two-year plan. ☐ One-Year ☒ Two-Year

**1.1a.** Provide the federal fiscal years this plan covers. Year One: FFY 2022  
Year Two: FFY 2023

**1.2. Lead Agency and Authorized Official:** Update the following information in relation to the lead agency and authorized official designated to administer CSBG in the State, as required by Section 676(a) of the CSBG Act. Information should reflect the responses provided in the Application for Federal Assistance, SF-424M.

Has information regarding the state lead agency and authorized official changed since the last submission of the State Plan?

☐ Yes ☒ No

If yes, select the fields that have changed. **[Check all that apply]**

- ☐ Lead Agency
- ☐ Department Type
- ☐ Department Name
- ☐ Authorized Official
- ☐ Street Address
- ☐ City
- ☐ Zip Code
- ☐ Office Number
- ☐ Fax Number
- ☐ Email Address
- ☐ Website

N/A

**1.2a.** Lead Agency: DIVISION OF COMMUNITY ACTION AGENCIES (DCAA)

**1.2b.** Cabinet or administrative department of the lead agency: **[Check one]**

- ☐ Community Affairs Department
- ☐ Community Services Department
- ☐ Governor's Office
- ☐ Health Department
- ☐ Housing Department
- ☐ Human Services Department
- ☐ Social Services Department
- ☒ Other, describe: DEPARTMENT OF HUMAN RIGHTS

**1.2c. Cabinet or Administrative Department Name:** Provide the name of the cabinet or administrative department of the CSBG authorized official.

DEPARTMENT OF HUMAN RIGHTS

**1.2d. Authorized Official of the Lead Agency:** The authorized official could be the director, secretary, commissioner, etc., as assigned in the designation letter (attached under item 1.3). The authorized official is the person indicated as authorized representative on the SF-424M and the official recipient of the Notice of Award per Office of Grant Management requirements.

Name and Title: WILLIAM BRAND, ADMINISTRATOR

- 1.2e. Street Address: LUCAS STATE OFFICE BUILDING, 2ND FLOOR
- 1.2f. City: DES MOINES
- 1.2g. State: IOWA
- 1.2h. Zip Code: 50319
- 1.2i. Telephone Number: 515-281-3268
- 1.2j. Fax Number: 515-242-6119
- 1.2k. Email Address: [Bill.Brand@iowa.gov](mailto:Bill.Brand@iowa.gov)
- 1.2l. Lead Agency Website: <https://humanrights.iowa.gov/dcaa/csbg>

- 1.3. **Designation Letter:** Attach the state's official CSBG designation letter. A new designation letter is required if the chief executive officer of the state and/or designated agency has changed.

**Instructional Note:** The letter should be from the chief executive office of the state and include, at minimum, the designated state CSBG lead agency (office, department, or bureau) and title of the authorized official of the lead agency who is to administer the CSBG grant award.

Attachment A: Designation Letter

- 1.4. **CSBG Point of Contact:** Provide the following information in relation to the designated state CSBG point of contact. The state CSBG point of contact should be the person that will be the main point of contact for CSBG within the State.

Has information regarding the state point of contact changed since the last submission of the State Plan?

☐ Yes ☒ No

If yes, select the fields that have changed. **[Check all that apply]**

- ☐ Agency Name
- ☐ Point of Contact
- ☐ Street Address
- ☐ City
- ☐ State
- ☐ Zip Code
- ☐ Office Number
- ☐ Fax Number
- ☐ Email Address
- ☐ Website

N/A

- 1.4a. Agency Name: DIVISION OF COMMUNITY ACTION AGENCIES
- 1.4b. Point of Contact Name and Title: WILLIAM BRAND, ADMINISTRATOR
- 1.4c. Street Address: LUCAS STATE OFFICE BUILDING, 2ND FLOOR
- 1.4d. City: DES MOINES
- 1.4e. State: IOWA

- 1.4f. Zip Code: 50319
- 1.4g. Telephone Number: 515-281-3268
- 1.4h. Fax Number: 515-242-6119
- 1.4i. Email Address: [Bill.Brand@iowa.gov](mailto:Bill.Brand@iowa.gov)
- 1.4j. Agency Website: <https://humanrights.iowa.gov/dcaa/csbg>

**1.5. State Community Action Association:** Provide the following information in relation to the State Community Action Association.

There is currently a Community Action Association within the State.

☒ Yes ☐ No

Has information in regards to the State Community Action Association changed since the last submission of the State Plan?

☒ Yes ☐ No

If yes, select the fields that have changed. **[Check all that apply]**

- ☐ Agency Name
- ☒ Executive Director (March 22, 2021)
- ☐ Street Address
- ☐ City
- ☐ State
- ☐ Zip Code
- ☐ Office Number
- ☐ Fax Number
- ☐ Email Address
- ☐ Website
- ☐ RPIC Lead

- 1.5a. Agency Name: IOWA COMMUNITY ACTION ASSOCIATION
- 1.5b. Executive Director or Point of Contact and Title: KATHERINE RILEY HARRINGTON, EXECUTIVE DIRECTOR
- 1.5c. Street Address: 1620 PLEASANT STREET, SUITE 214
- 1.5d. City: DES MOINES
- 1.5e. State: IOWA
- 1.5f. Zip Code: 50314
- 1.5g. Telephone Number: 515-244-0328
- 1.5h. Fax Number: 515-280-3377
- 1.5i. Email Address: [kharrington@iowacaa.org](mailto:kharrington@iowacaa.org)
- 1.5j. State Association Website: <https://iowacommunityaction.org>
- 1.5k. State Association currently serves as the Regional Performance Innovation Consortia (RPIC) lead.
- ☒ Yes ☐ No

**SECTION 2**  
**State Legislation and Regulation**

- 2.1. CSBG State Legislation:** State has a statute authorizing CSBG.

☒ Yes ☐ No

- 2.2. CSBG State Regulation:** State has regulations for CSBG.

☒ Yes ☐ No

- 2.3. Legislation/Regulation Document:** Attach the legislation and/or regulations or provide a hyperlink(s) to the documents indicated under items 2.1 and/or 2.2.

Attachment B: 2021 Iowa Code (state legislation)

Attachment C: 2021 Iowa Acts, House File 895 (state legislation)

Attachment D: Iowa Administrative Code (state regulations)

- 2.4. State Authority:** Select a response for each of the following items about the state statute and/or regulations authorizing CSBG:

- 2.4a. Authorizing Legislation:** State legislature enacted authorizing legislation or amendments to an existing authorizing statute last federal fiscal year.

☒ Yes ☐ No

2021 Iowa Acts, House File 895

- 2.4b. Regulation Amendments:** State established or amended regulations for CSBG last federal fiscal year.

☐ Yes ☒ No

- 2.4c. Designation:** State statutory or regulatory authority designates the bureau, division, or office in the State government that is to be the state administering agency.

☒ Yes ☐ No



### SECTION 3

#### State Plan Development and Statewide Goals

- 3.1. CSBG Lead Agency Mission and Responsibilities:** Briefly describe the mission and responsibilities of the state agency that serves as the CSBG lead agency.

The mission of the Iowa Department of Human Rights is to ensure basic rights, freedoms, and opportunities for all by empowering under-represented Iowans and eliminating economic, social, and cultural barriers.

The State CSBG Office is one of three offices within the Division of Community Action Agencies (DCAA). The mission of the DCAA is to support community action agencies' and other community-based organizations' efforts to assist low-income individuals and families with basic energy needs, food needs, shelter needs, and in working towards achieving self-sufficiency.

The purpose of the DCAA is to strengthen, supplement, and coordinate efforts to develop the full potential of each citizen by recognizing certain community action agencies and supporting certain community-based programs delivered by community action agencies.

The responsibilities of the DCAA are to:

- Provide financial assistance for community action agencies to implement community action programs, as permitted by the CSBG and subject to the funding made available for the program;
- Administer the CSBG, the Low-Income Home Energy Assistance Program block grants, U. S. Department of Energy funds for weatherization, and other possible funding sources;
- Implement accountability measures for its programs and require regular reporting on the measures by the community action agencies; and
- Issue an annual report to the Governor and General Assembly each year.

The responsibilities are defined in the 2021 Iowa Code, Chapter 216A, Subchapter 6 (state regulations).

- 3.2. State Plan Goals:** Describe the state's CSBG-specific goals for state administration of CSBG under this State Plan.

**Instructional Note:** For examples of "goals," see State Accountability Measure 1Sa(i).

The State CSBG Office's FFY 2022 and FFY 2023 CSBG specific goals for administration of CSBG under this State Plan are:

#### DISTRIBUTION OF FUNDS

1. The State CSBG Office will make CSBG funds available to Iowa's community action agencies within 30 calendar days of receipt of a CSBG grant award notice from the U. S. Department of Health and Human Services, Administration for Children and Families.

#### MONITORING AND

1. The State CSBG Office will conduct CSBG program operations reviews at:
  - a. 5 of 16 agencies in FFY 2022
  - b. 5 of 16 agencies in FFY 2023
2. The State CSBG Office will conduct CSBG organizational standards assessments at:
  - a. 5 of 16 agencies in FFY 2022
  - b. 5 of 16 agencies in FFY 2023
3. The State CSBG Office will conduct CSBG organizational standards agency self-assessment desk-reviews for:
  - a. 11 of 16 agencies in FFY 2022
  - b. 11 of 16 agencies in FFY 2023

4. The State CSBG Office will complete and issue a CSBG program operations review report within 60 calendar days of an agency's review exit meeting date.
5. The State CSBG Office will complete and issue a CSBG organizational standards assessment report within 60 calendar days of an agency's assessment exit meeting date.
6. The State CSBG Office will complete and issue a CSBG organizational standards agency self-assessment validation letter or report within 60 calendar days of receipt of an agency's self-assessment.

#### **COMMUNICATION**

1. The Administrator of the State CSBG Office or a State CSBG Office Program Manager will attend and report on the State CSBG Office's programs at all Iowa Community Action Association Board of Directors' meetings.
2. At least one State CSBG Office Program Manager will attend and present a CSBG program report at all Iowa community action agency ROMA Subgroup meetings.

**Note:** This information is associated with State Accountability Measure 1Sa(i).

### **3.3. State Plan Development:** Indicate the information and input the state accessed to develop this State Plan.

#### **3.3a. Analysis of state-level tools [Check all that apply]**

- ☒ State Performance Indicators and/or National Performance Indicators (NPIs)
- ☒ U.S. Census data
- ☒ State performance management data (e.g., accountability measures, ACSI survey information, and/or other information from annual reports)
- ☒ Monitoring visits/assessments
- ☐ Tools not identified above, specify:

#### **3.3b. Analysis of local-level tools [Check all that apply]**

- ☐ Eligible entity community needs assessments
- ☒ Eligible entity community action plans
- ☒ Public hearings/workshops
- ☐ Tools not identified above, specify:

#### **3.3c. Consultation with [Check all that apply]**

- ☒ Eligible entities (e.g., meetings, conferences, webinars; not including the public hearing)
- ☒ State Association
- ☐ National Association for State Community Services Programs (NASCSPP)
- ☐ Community Action Partnership (The Partnership)
- ☐ Community Action Program Legal Services (CAPLAW)
- ☐ CSBG Tribal Training and Technical Assistance (T/TA) provider
- ☐ Regional Performance Innovation Consortium (RPIC)
- ☐ Association for Nationally Certified ROMA Trainers (ANCRT)
- ☐ Federal CSBG Office
- ☐ Organizations not identified above, specify:

### 3.4. Eligible Entity Involvement

- 3.4a. State Plan Development:** Describe the specific steps the state took in developing the State Plan to involve the eligible entities.

The State CSBG Office included and involved the Iowa Community Action Association (ICAA) and Iowa's community action agencies in the development of this State Plan. The following were the steps taken to involve ICAA and the agencies:

May 6, 2021: The Administrator of the State CSBG Office attended ICAA's Board of Directors' meeting. The Administrator provided a progress update on the development of the State Plan.

April 15, 2021: A State CSBG Office Program Manager attended the agencies' ROMA Subgroup meeting. The CSBG Program Manager provided information about the State Plan, the State CSBG Office's State Plan development process, and a progress update.

June 3, 2021: The Administrator of the State CSBG Office attended ICAA's Board of Directors' meeting. The Administrator provided a progress update on the development of the State Plan.

July 1, 2021: The Administrator of the State CSBG Office and a State CSBG Office Program Manager attended ICAA's Board of Directors' meeting. Prior to the meeting, the CSBG Program Manager distributed, through e-mail, copies of the initial draft State Plan to ICAA and the Executive Directors. During the meeting, the CSBG Program Manager provided a progress update on the development of the State Plan and distributed and reviewed the State Plan development timeline and a two-page document that summarizes each section of the State Plan. The Administrator of the State CSBG Office and CSBG Program Manager also fielded State Plan questions during the meeting.

July 21, 2021: The State CSBG Office distributed, through e-mail, copies of the final draft State Plan and two-page document that summarizes each section of the State Plan to ICAA, the Executive Directors, and ROMA Subgroup members.

August 5, 2021: The Administrator of the State CSBG Office and a State CSBG Office Program Manager will attend ICAA's Board of Directors' meeting. During the meeting, the CSBG Program Manager will provide a progress update on the State Plan, field questions, and accept State Plan comments.

Prior to the State CSBG Office submitting the State Plan to the Office of Community Services, the Iowa Commission on Community Action Agencies will review the State Plan, act on it during their August 20, 2021 meeting, and approve it for submission.

**Note:** This information is associated with State Accountability Measure 1Sa(ii).

- 3.4b. Performance Management Adjustment:** Describe how the state has adjusted its State Plan development procedures under this State Plan, as compared to previous State Plans, in order to 1) encourage eligible entity participation and 2) to ensure the State Plan reflects input from eligible entities. Any adjustment should be based on the state's analysis of past performance in these areas, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the state is not making any adjustments, provide further detail.

The following are the Development of CSBG State Plan scores from Iowa's American Customer Satisfaction Index (ACSI) Eligible Entities Satisfaction with the States Survey reports: 67 (2015 ACSI), 85 (2017 ACSI), 83 (2019 ACSI), and 90 (2021 ACSI). ACSI scores of 80-89 are considered excellent, 90-100 exceptional.

In response to the 2015 ACSI score of 67 for Development of the CSBG State Plan, in February 2017, the State CSBG Office, Iowa Community Action Association (ICAA), and Iowa's community action agency Executive Directors made some adjustments to the State CSBG Office's State Plan development procedures. The adjustments, which are still in place, include additional development progress updates to ICAA and the Executive Directors, and additional opportunities for ICAA, the Executive Directors, and ROMA Subgroup members to be involved and contribute in the development of the State Plan.

Since the February 2017 adjustments, Iowa's ACSI scores for Development of the CSBG State Plan and the scores within the Development of the CSBG State Plan category have consistently been in the excellent and exceptional range. Therefore, based on a review of the ACSI reports, the State CSBG Office did not make any changes to its State Plan development procedures for this State Plan.

**Note:** This information is associated with State Accountability Measure 1Sb(i) and 1Sb(ii).

**3.5. Eligible Entity Overall Satisfaction:** Provide the state's target for eligible entity Overall Satisfaction during the performance period.

**Instructional Note:** The state's target score will indicate improvement or maintenance of the states' Overall Satisfaction score from the most recent American Customer Survey Index (ACSI) survey of the state's eligible entities.

Year One: 97

Year Two: 97

The following are the Overall Satisfaction scores from Iowa's American Customer Satisfaction Index (ACSI) Eligible Entities Satisfaction with the States Survey reports: 92 (2015 ACSI), 97 (2017 ACSI), 95 (2019 ACSI), and 97 (2021 ACSI). ACSI scores of 80-89 are considered excellent, 90-100 exceptional.

For this performance period (FFY 2022 and FFY 2023), the State CSBG Office set its targets for agency overall satisfaction at 97. These target scores are maintenance goals. To match the State CSBG Office's FFY 2022 performance period target, the State CSBG Office will report a future target of 97 in Iowa's FFY 2021 CSBG Annual Report.

**Note:** This information is associated with State Accountability Measure 8s.

## SECTION 4

### CSBG Hearing Requirements

- 4.1. Public Inspection:** Describe the steps taken by the state to disseminate this State Plan to the public for review and comments prior to the public hearing, as required under Section 676(e)(2) of the CSBG Act.

Iowa's State Plan public inspection and comment period was from July 26, 2021 through August 10, 2021. On July 21, 2021 the State CSBG Office issued a public inspection and public hearing news release to the news media for statewide distribution, and issued its public inspection and public hearing notice with posting guidance to the Iowa Community Action Association (ICAA) and each of Iowa's sixteen community action agencies. On July 26, 2021, the State CSBG Office posted the public inspection and public hearing notice on its website. The news release and notice notified interested persons, partners, and stakeholders that the State Plan was available for review on the State CSBG Office's website, and an electronic copy of the State Plan could be requested by contacting the State CSBG Office. The news release and notice also included directions for submitting comments to the State CSBG Office.

Copies of the State Plan were also distributed to the Iowa Commission on Community Action Agencies (the State CSBG Office's governing board) on July 21, 2021. The State CSBG Office reviewed, provided the comments collected from the public inspection period and public hearing, and discussed the State Plan with commission members during their August 20, 2021 meeting. The commission acted on the State Plan during their August 20, 2021 meeting.

- 4.2. Public Notice/Hearing:** Describe how the state ensured there was sufficient time and statewide distribution of notice of the public hearing(s) to allow the public to comment on the State Plan, as required under 676(a)(2)(B) of the CSBG Act.

Iowa's State Plan public hearing was conducted on August 11, 2021. On July 21, 2021 the State CSBG Office issued a public inspection and public hearing news release to the news media for statewide distribution, and issued its public inspection and public hearing notice with posting guidance to the Iowa Community Action Association (ICAA) and each of Iowa's sixteen community action agencies. On July 26, 2021, the State CSBG Office posted the public inspection and public hearing notice on its website. The posting was on the State CSBG Office's website from July 26, 2021 through August 10, 2021.

Copies of the State Plan were also distributed to the Iowa Commission on Community Action Agencies (the State CSBG Office's governing board) on July 21, 2021. The State CSBG Office reviewed, provided the comments collected from the public inspection period and public hearing, and discussed the State Plan with commission members during their August 20, 2021 meeting. The commission acted on the State Plan during their August 20, 2021 meeting.

- 4.3. Public and Legislative Hearings:** In the table below, specify the date(s) and location(s) of the public and legislative hearing(s) held by the designated lead agency for this State Plan, as required under Section 676(a)(2)(B) and Section 676(a)(3) of the CSBG Act.

**Instructional Note:** A public hearing is required for each new submission of the State Plan. The date(s) for the public hearing(s) must have occurred in the year prior to the first federal fiscal year covered by this plan. Legislative hearings are held at least every three years, and must have occurred within the last three years prior to the first federal fiscal year covered by this plan.

Date	Location	Type of Hearing
May 6, 2021	Iowa State Capitol, Room 103, 5:00 p.m.	Legislative
August 11, 2021	Lucas State Office Building, Room 208, 9:00 a.m.	Public

- 4.4.** Attach supporting documentation or a hyperlink for the public and legislative hearings.

Attachment E: Notice of public inspection and public hearing news release

Attachment F: State Plan distribution communications

Attachment G: Notice of public inspection and public hearing announcement

Attachment H: Legislative hearing documentation

## SECTION 5

### CSBG Eligible Entities

- 5.1. CSBG Eligible Entities:** In the table below, indicate whether the eligible entity in the State is public or private, the type of entity, and the geographical area served by the entity.

**Instructional Note:** Whether public or nonprofit, entities that receive CSBG funds are generally considered to be Community Action Agencies for the purposes of administering CSBG. The only specific exemptions outlined in the CSBG Act are Limited Purpose Agencies, Migrant and Seasonal Farmworker Organizations, and Tribes and Tribal Organizations.

**Instructional Note:** Limited Purpose Agency refers to an eligible entity that was designated as a limited purpose agency under Title II of the Economic Opportunity Act of 1964 for fiscal year 1981, that served the general purposes of a community action agency under Title II of the Economic Opportunity Act, that did not lose its designation as a limited purpose agency under Title II of the Economic Opportunity Act as a result of failure to comply with that Act, and that has not lost its designation as an eligible entity under the CSBG Act.

**Instructional Note:** 90 percent funds are the funds a state provides to eligible entities to carry out the purposes of the CSBG Act. As described under Section 675C of the CSBG Act, a state must provide to the eligible entities “not less than 90 percent” of their CSBG allocation “made available to a state” under Section 675A and 675B.

CSBG Eligible Entity	Geographical Area Served (by county)	Public or Private	Type of Entity (Choose all that apply)
			<ul style="list-style-type: none"> <li>• Community Action Agency</li> <li>• Limited Purpose Agency</li> <li>• Local Government Agency</li> <li>• Migrant or Seasonal Farmworker Organization</li> <li>• Tribe or Tribal Organization</li> </ul>

The attached information will be included in the table:

Attachment I: CSBG Eligible Entities

- 5.2.** Total number of CSBG eligible entities: **16**
- 5.3. Changes to Eligible Entities List:** Describe any changes that have occurred to the eligible entities within the State since the last federal fiscal year, as applicable.

One or more of the following changes were made to the eligible entities list. **[Check all that apply]**

- ☐ Designation and/or Re-Designation
- ☐ De-Designation and/or Voluntary Relinquishments
- ☒ Mergers
- ☐ Changes to Eligible Entities List

- 5.3a. Designation and Re-Designation:** Identify any new entities that have been designated as eligible entities, as defined under Section 676A of the CSBG Act, since the last federal fiscal year. Include any eligible entities designated to serve an area previously not served by CSBG as well as any entities designated to replace another eligible entity that was terminated (de-designated) or that voluntarily relinquished its status as a CSBG eligible entity.

N/A

- 5.3b. De-Designation and Voluntary Relinquishments:** Identify any entities that are no longer receiving CSBG funding. Include any eligible entities that have been terminated (de-designated) as defined under Section 676(c) and Section 676C of the CSBG Act, or voluntarily relinquished their CSBG eligible entity status since the last federal fiscal year.

N/A

- 5.3c. Mergers:** In the table below, provide information about any mergers or other combinations of two or more eligible entities that were each listed in the prior year State Plan.

Original CSBG Eligible Entities	Surviving CSBG Eligible Entity	New Name (as applicable)	DUNS Number
Hawkeye Area Community Action Program, Inc.  Operation: New View Community Action Agency	Hawkeye Area Community Action Program, Inc.	N/A	039311399



**SECTION 6**  
**Organizational Standards for Eligible Entities**

**Note:** Reference IM 138, State Establishment of Organizational Standards for CSBG Eligible Entities, for more information on organizational standards.

- 6.1. Choice of Standards:** Confirm whether the state will implement the CSBG Organizational Standards Center of Excellence (COE) organizational standards (as described in IM 138) or an alternative set during the federal fiscal years of this planning period. **[Select one]**

- ☒ COE CSBG Organizational Standards
- ☐ Modified version of COE CSBG Organizational Standards
- ☐ Alternative set of organizational standards

- 6.1a. Modified Organizational Standards:** In the case that the state is requesting to use modified COE-developed organizational standards, provide the proposed modification for the FFYs of this planning period including the rationale.

N/A

- 6.1b. Alternative Organizational Standards:** If using an alternative set of organizational standards, attach the complete list of alternative organizational standards.

N/A

- 6.1c. Alternative Organizational Standards:** If using an alternative set of organizational standards: 1) provide any changes from the last set provided during the previous State Plan submission; 2) describe the reasons for using alternative standards; and 3) describe how they are at least as rigorous as the COE-developed standards.

N/A

- 6.2. Implementation:** Check the boxes that best describe how the state officially adopted organizational standards for eligible entities in a manner consistent with the state's administrative procedures. If "Other" is selected, provide a timeline and additional information, as necessary. **[Check all that apply]**

- ☐ Regulation
- ☒ Policy
- ☒ Contracts with eligible entities
- ☒ Other, describe:

Iowa's community action agencies are required to complete and submit a CSBG Community Action Plan and Application annually. The application includes CSBG organizational standards compliance requirements.

- 6.3. Organizational Standards Assessment:** Describe how the state will assess eligible entities against organizational standards in the federal fiscal years. **[Check all that apply]**

- ☐ Peer-to-peer review (with validation by the state or state-authorized third party)
- ☒ Self-assessment (with validation by the state or state-authorized third party)
- ☐ Self-assessment/peer review with state risk analysis
- ☐ State-authorized third party validation
- ☒ Regular, on-site CSBG monitoring
- ☐ Other, describe:

**6.3a. Assessment Process:** Describe the planned assessment process.

The State CSBG Office conducts CSBG organizational standards assessments at each Iowa community action agency triennially (at least once during a three-year period). Assessments are conducted at the same time regular CSBG program operations reviews are conducted. Once the State CSBG Office completes an assessment, the State CSBG Office issues a report no later than 60 calendar days following the review and assessment exit meeting.

Desk-Monitoring (Desk-Reviews)

Agency documents and materials that are, or can be made, readily available to the State CSBG Office, are necessary for completing the assessment, and do not require the State CSBG Office to visit the agency to inspect and assess, may be reviewed at the State CSBG Office as part of the agency's assessment.

Agencies that are not scheduled to receive an assessment during a federal fiscal year are required to complete and submit a CSBG organizational standards agency self-assessment. The State CSBG Office provides instructions, guidance, and an agency self-assessment instrument for those agencies to complete and submit. The State CSBG Office reviews and validates, through a desk-review process, all agency self-assessments and issues a report no later than 60 calendar days following the receipt of an agency self-assessment.

The State CSBG Office's reviews and assessments schedule is provided in Section 10 (10.1). Full onsite reviews and assessments include a regular CSBG program operations review and a CSBG organizational standards assessment. The 11 agencies that are not scheduled for a review and assessment (no review) in FFY 2022, and the 11 agencies that are not scheduled for a review and assessment (no review) in FFY 2023, will be required to complete and submit a CSBG organizational standards agency self-assessment as directed by the State CSBG Office.

GUIDING PRINCIPALS

The State CSBG Office conducts its assessments according to the three CSBG monitoring principles: 1) mutual respect, 2) open communication, and 3) joint problem solving. The monitoring principles are defined in the National Association for State and Community Services Programs, CSBG Monitoring Standards.

**6.4. Eligible Entity Exemptions:** Will the state make exceptions in applying the organizational standards for certain eligible entities due to special circumstances or organizational characteristics (as described in IM 138)?

☐ Yes ☒ No

**6.4a.** Provide the specific eligible entities the state will exempt from meeting organizational standards, and provide a description and a justification for each exemption.

N/A

**6.5. Performance Target:** Provide the percentage of eligible entities that the state expects to meet all the state-adopted organizational standards for the FFYs of this planning period.

Year One: 93%

Year Two: 93%

**Note:** This information is associated with State Accountability Measure 6Sa.

**SECTION 7**  
**State Use of Funds**

**Eligible Entity Allocation (90 Percent Funds)** [Section 675C(a) of the CSBG Act]

**7.1**     **Formula:** Select the method (formula) that best describes the current practice for allocating CSBG funds to eligible entities. **[Check one]**

- ☐ Historic
- ☐ Base + Formula
- ☐ Formula Alone
- ☐ Formula with Variables
- ☐ Hold Harmless + Formula
- ☒ Other, describe: FORMULA + FLOOR

**7.1a.     Formula Description:** Describe the current practice for allocating CSBG funds to eligible entities.

The following are the procedures for allocating Iowa's CSBG allotment to Iowa's community action agencies. Iowa uses a FORMULA + FLOOR method for allocating its CSBG allotment:

Step 1: FORMULA: 96% of Iowa's CSBG allotment is allocated to the agencies using state poverty-level population data. Iowa's poverty-level data (individuals at or below 125% of the U. S. Department of Health and Human Services Poverty Guidelines) from the U. S. Census Bureau's 2010 decennial survey is used to calculate each agency's percentage of the state's poverty-level population.

Step 2: FLOOR: Iowa's CSBG minimum allocation level for agencies is \$160,000. Therefore, after the CSBG funds are allocated to the agencies (Step 1), the agencies with an allocation amount lower than \$160,000 are identified and their allocation is raised and set at \$160,000.

Step 3: SUBSIDIZING THE FLOOR:

- 1) The amount of CSBG funds needed to raise the agencies to the FLOOR is calculated. This is the subsidy amount.
- 2) Agencies that had an increase in their percentage of the state's poverty-level population, calculated using data from the U. S. Census Bureau's 2000 and 2010 decennial surveys, subsidize the FLOOR. The subsidy share for each agency required to contribute to the subsidy is calculated and then their allocation is reduced by the amount of their subsidy share. The following are the four agencies that contribute to the subsidy and the percentage of the subsidy (share) they are responsible for: IMPACT Community Action Partnership (60% of the subsidy), Hawkeye Area Community Action Program (26%), Mid-Iowa Community Action (9%), and Community Action of Southeast Iowa (5%).

**7.1b.     Statute:** Does the state statutory or regulatory authority specify the formula for allocating "not less than 90 percent" funds among eligible entities?

☒ Yes   ☐ No

**7.2.     Planned Allocation:** Specify the percentage of your CSBG planned allocation that will be funded to eligible entities and in accordance to the "not less than 90 percent funds" requirement as described under Section 675C(a) of the CSBG Act. In the table, provide the planned allocation for each eligible entity receiving funds for the fiscal years covered by this State Plan.

Year One: 96%

Year Two: 96%

**Planned CSBG 90 Percent Funds**

CSBG Eligible Entity	Year One	Year Two
	Funding Amount \$	Funding Amount \$
<b>Total</b>		

The attached information will be included in the table.

Attachment J: Planned Allocation (FFY 2022)

- 7.3. Distribution Process:** Describe the specific steps in the State's process for distributing 90 percent funds to the eligible entities and include the number of days each step is expected to take. Please include information about state legislative approval or other types of administrative approval (such as approval by a board or commission).

Iowa law (2021 Iowa Acts, House File 895) addresses and provides the requirements for how Iowa's FFY 2022 and FFY 2023 CSBG allotments are to be distributed and allocated by the State CSBG Office.

Ninety-six percent (96%) of the CSBG allotments must be distributed to Iowa's community action agencies, four percent (4%) to the State CSBG Office for administration, and zero percent (0%) for remainder/discretionary uses.

The following are the State CSBG Office's formula requirements for allocating 96% of Iowa's CSBG allotment to the agencies. The allocation formula requirements were developed by a committee of State CSBG Office staff, commissioners from the Iowa Commission on Community Action Agencies, the Iowa Community Action Association staff, and the Executive Directors from the Iowa community action agencies.

1. 96% of Iowa's CSBG allotment is allocated to the agencies using state poverty-level population percentages. See Section 7 (7.1a. Formula Description) for calculation information.
2. Iowa's CSBG minimum allocation level for agencies is \$160,000. See Section 7 (7.1a. Formula Description) for calculation and subsidizing information.
3. If Iowa's final CSBG annual allotment is less than \$6.57 million, the committee may revisit and act on the allocation formula requirements.

For FFY 2022, the State CSBG Office will adhere to these allocation formula requirements.

For FFY 2023, the State CSBG Office will reconvene its allocation formula committee and develop new allocation formula requirements using Iowa's poverty-level data from the U. S. Census Bureau's 2020 decennial survey. The new allocation formula requirements will be used to allocate FFY 2023 CSBG funds to the agencies if the following conditions are met prior to FFY 2023:

1. The allocation formula committee will develop new allocation formula requirements
2. The State CSBG Office provides adequate notice and holds a public hearing on the new allocation formula requirements
3. The Commission on Community Action Agencies approves, via commission action, the new allocation formula requirements
4. The State CSBG Office provides a timely submission of the new allocation formula requirements through a State Plan amendment to the Office of Community Services (OCS)
5. OCS accepts the State CSBG Office's State Plan amendment

If any of these conditions are not met prior to FFY 2023, the State CSBG Office will allocate FFY 2023 CSBG funds using the current allocation formula requirements.

The State CSBG Office's steps for allocating 96% of Iowa's CSBG funds to the agencies:

1. Prior to the start of the federal fiscal year the State CSBG Office issues a CSBG contract to each agency. Agencies are issued a contract after their annual CSBG Community Action Plan and Application is accepted by the State CSBG Office. The contracts include the agency's projected CSBG allocation and a project budget that equals the projected allocation amount.
2. Within 30 calendar days of receiving a CSBG grant award notice from the U. S. Department of Health and Human Services, Administration for Children and Families (ACF), the State CSBG Office will distribute the CSBG allotment, calculate the amount of funds available for each agency, and notify each agency of the amount of CSBG funds currently available for their agency. The amount of CSBG funds provided to the agency in the notification is the maximum amount of funds available for the agency until the State CSBG Office receives additional CSBG grant award notices from ACF.
3. Within 30 calendar days of receipt of Iowa's final CSBG allotment amount from ACF, the State CSBG Office will distribute the CSBG allotment, calculate final agency allocations, and notify each agency of their final CSBG allocation amount for the federal fiscal year. The final amount of CSBG funds provided to the agency in the notification is the maximum amount of funds available for their CSBG contract. Using their final allocation amount, agencies are directed and allowed at least 30 calendar days from the State CSBG Office's notification to prepare and submit a CSBG contract budget amendment request to the State CSBG Office. Once a request is received, reviewed, and accepted by the State CSBG Office, the State CSBG Office will issue a CSBG contract amendment that includes the agency's final allocation amount and amended project budget. The State CSBG Office issues these contract amendments within 30 calendar days of the State CSBG Office's receipt of an acceptable budget amendment request.

**7.3a. Distribution Method:** Select the option below that best describes the distribution method the state uses to issue CSBG funds to among eligible entities:

- ☐ Reimbursement
- ☐ Advance
- ☒ Hybrid
- ☐ Other, describe:

**7.4. Distribution Timeframe:** Does the state intend to make funds available to eligible entities no later than 30 calendar days after OCS distributes the federal award?

☒ Yes ☐ No

**7.4a. Distribution Consistency:** If no, describe state procedures to ensure funds are made available to eligible entities consistently and without interruption.

N/A

**Note:** Item 7.4 is associated with State Accountability Measure 2Sa.

**7.5. Distribution of Funds Performance Management Adjustment:** Describe the state's strategy for improving grant and/or contract administration procedures under this State Plan as compared to past State Plans. Any improvements should be based on analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the state is not making any improvements, provide further detail.

On Iowa's 2021 American Customer Satisfaction Index (ACSI) Eligible Entities Satisfaction with the States Survey report, the State CSBG Office scored 98 for Distribution of Funds. Since 2015, the State CSBG Office's Distribution of Funds scores have been 95 or higher. ACSI scores of 80-89 are considered excellent, 90-100 exceptional.

The following distribution of funds goal is in Iowa's FFY 2020-2021 CSBG State Plan and Application:

#### DISTRIBUTION OF FUNDS

The State CSBG Office will make CSBG funds available to Iowa's community action agencies within 30 calendar days of receipt of a CSBG grant award notice from the U. S. Department of Health and Human Services, Administration for Children and Families.

For FFY 2020, the State CSBG Office received six CSBG grant award notices. For five of the notices, the State CSBG Office made the CSBG funds available to Iowa's community action agencies within 30 calendar days of receipt of the notice. As of the date this State Plan was submitted, the State CSBG Office was meeting its FFY 2021 distribution of funds goal.

Based on a review of the scores and results, the State CSBG Office is not making any changes to its procedures for distributing CSBG funds to the agencies.

**Note:** This information is associated with State Accountability Measure 2Sb.

#### **Administrative Funds** [Section 675C(b)(2) of the CSBG Act]

- 7.6. Allocated Funds:** Specify the percentage of your CSBG planned allocation for administrative activities for the FFYs covered by this State Plan.

Year One: 4%

Year Two: 4%

- 7.7. State Staff:** Provide the number of state staff positions to be funded in whole or in part with CSBG funds for the FFYs covered by this State Plan.

Year One: 5 (Administrator, CSBG Program Managers (2), Administrative Assistant, and Budget Analyst)

Year Two: 5 (Administrator, CSBG Program Managers (2), Administrative Assistant, and Budget Analyst)

- 7.8. State FTEs:** Provide the number of state Full Time Equivalents (FTEs) to be funded with CSBG funds for the FFYs covered by this State Plan.

Year One: 2.28 (0.34 Administrator, 1.00 CSBG Program Manager, 0.30 CSBG Program Manager, 0.34 Administrative Assistant, and 0.30 Budget Analyst)

Year Two: 2.28 (0.34 Administrator, 1.00 CSBG Program Manager, 0.30 CSBG Program Manager, 0.34 Administrative Assistant, and 0.30 Budget Analyst)

#### **Use of Remainder/Discretionary Funds** [Section 675C(b) of the CSBG Act]

- 7.9. Remainder/Discretionary Funds Use:** Does the state have remainder/discretionary funds, as described in Section 675C(b) of the CSBG Act?

☐ Yes ☒ No

If yes, provide the allocated percentage and describe the use of the remainder/discretionary funds in the table below.

N/A

**Note:** This response will link to the corresponding assurance, item 14.2.

**Instructional Note:** The assurance under 676(b)(2) of the CSBG Act (item 14.2 of this State Plan) specifically requires a description of how the state intends to use remainder/discretionary funds to “support innovative community and neighborhood-based initiatives related to the purposes of [the CSBG Act].” Include this description in item 7.9f of the table below and/or attach the information.

If a funded activity fits under more than one category in the table, allocate the funds among the categories. For example, if the state provides funds under a contract with the State Community Action Association to provide training and technical assistance to eligible entities and to create a statewide data system, the funds for that contract should be allocated appropriately between items 7.9a – 7.9c. If allocation is not possible, the state may allocate the funds to the primary category with which the activity is associated.

**Use of Remainder/Discretionary Funds**

<b>Remainder/ Discretionary Fund Uses</b> (See 675C(b)(1) of the CSBG Act)	<b>Year One</b>	<b>Year Two</b>	<b>Brief Description of Services and/or Activities</b>
	<b>Planned \$</b>	<b>Planned \$</b>	
7.9a. Training/technical assistance to eligible entities			These planned services/activities will be described in State Plan item 8.1.
7.9b. Coordination of State-operated programs and/or local programs			These planned services/activities will be described in State Plan Section 9, State Linkages and Communication.
7.9c. Statewide coordination and communication among eligible entities			These planned services/activities will be described in State Plan Section 9, State Linkages and Communication.
7.9d. Analysis of distribution of CSBG funds to determine if targeting greatest need			
7.9e. Asset-building programs			
7.9f. Innovative programs/activities by eligible entities or other neighborhood groups			
7.9g. State charity tax credits			
7.9h. Other activities			Specify the other activities funded through discretionary funds.
<b>Totals</b>			

N/A

**Note:** This information is associated with State Accountability Measure 3Sa.

**7.10. Remainder/Discretionary Funds Partnerships:** Select the types of organizations, if any, the state intends to work with (by grant or contract using remainder/discretionary funds) to carry out some or all of the activities in table 7.9. **[Check all that apply]**

- ☐ The state directly carries out all activities (no partnerships)
- ☒ The state does not have remainder/discretionary funds
- ☐ The state partially carries out some activities
- ☐ CSBG eligible entities (if checked, include the expected number of CSBG eligible entities to receive funds)
- ☐ Other community-based organizations
- ☐ State Community Action Association
- ☐ Regional CSBG technical assistance provider(s)
- ☐ National technical assistance provider(s)
- ☐ Individual consultant(s)
- ☐ Tribes and Tribal Organizations
- ☐ Other, specify:

**Note:** This response will link to the corresponding CSBG assurance, item 14.2.

**7.11. Use of Remainder/Discretionary Funds Performance Management Adjustment:** Describe any adjustments the state will make to the use of remainder/discretionary funds under this State Plan as compared to past State Plans. Any adjustment should be based on the state's analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the state is not making any adjustments, provide further detail.

N/A (Iowa's CSBG Program does not have remainder/discretionary funds.)

Iowa's CSBG Program does not have remainder/discretionary funds to support Community Action initiatives and activities. Therefore, Use of Discretionary Funds scores and feedback from Iowa's American Customer Satisfaction Index (ACSI) Eligible Entities Satisfaction with States Survey reports and other sources do not apply.

**Note:** This information is associated with State Accountability Measure 3Sb.



## SECTION 8

### State Training and Technical Assistance

- 8.1. Training and Technical Assistance Plan:** Describe the state’s plan for delivering CSBG-funded training and technical assistance to eligible entities under this State Plan by completing the table below. The T/TA plan should include all planned CSBG T/TA activities funded through the administration or remainder/discretionary funds of this CSBG award (as reported in Section 7). The CSBG T/TA plan should include training and technical assistance conducted directly by the state or through partnerships (as specified in 8.3). Add a row for each activity: indicate the timeframe; whether it is training, technical assistance or both; and the topic.

**Training and Technical Assistance**

Planned Timeframe	Training, Technical Assistance, or Both	Topic	Brief Description of “Other”
<ul style="list-style-type: none"> <li>• FY1 – Q1</li> <li>• FY1 – Q2</li> <li>• FY1 – Q3</li> <li>• FY1 – Q4</li> <li>• FY2 – Q1</li> <li>• FY2 – Q2</li> <li>• FY2 – Q3</li> <li>• FY2 – Q4</li> <li>• Ongoing/Multiple Quarters</li> <li>• All Quarters</li> </ul>	<ul style="list-style-type: none"> <li>• Training</li> <li>• Technical Assistance</li> <li>• Both</li> </ul>	<ul style="list-style-type: none"> <li>• Fiscal</li> <li>• Governance/Tripartite Boards</li> <li>• Organizational Standards – General</li> <li>• Organizational Standards – for eligible entities with unmet TAPs or QIPs</li> <li>• Correcting Significant Deficiencies Among Eligible Entities</li> <li>• Reporting</li> <li>• ROMA</li> <li>• Community Assessment</li> <li>• Strategic Planning</li> <li>• Monitoring</li> <li>• Communication</li> <li>• Technology</li> <li>• Other</li> </ul>	<p>If “Other” is selected in column 3, describe in this column.</p>

The following information will be included in the table:

FFY 2022 (4th quarter) - Training - Other - Iowa Community Action Association Annual Conference  
 FFY 2023 (4th quarter) - Training - Other - Iowa Community Action Association Annual Conference

**Note:** This information is associated with State Accountability Measure 3Sc.

- 8.1a. Training and Technical Assistance Budget:** The planned budget for the training and technical assistance:

Year One: \$5,000  
 Year Two: \$5,000

- 8.1b. Training and Technical Assistance Collaboration:** Describe how the state will collaborate with the State Community Action Association and other stakeholders in the planning and delivery of training and technical assistance.

The State CSBG Office collaborates with the Iowa Community Action Association (ICAA) in planning and delivering training and technical assistance to Iowa’s community action agencies. During this planning period (FFY 2022 and FFY 2023), the State CSBG Office will partner with ICAA on the following training and technical assistance initiatives:

- The ICAA Annual Conference: The State CSBG Office Program Managers are members of the ICAA conference planning committee, and the State CSBG Office will provide funding and resources for conference training needs, workshop speakers, and recognition awards.

- **State Training and Technical Assistance Plan:** The State CSBG Office will collaborate with ICAA on the planning and development of the State's comprehensive Training and Technical Assistance Plan.
- **Iowa Community Action Agency Trainings:** The State CSBG Office will work with ICAA on identifying agency training needs and assisting ICAA on developing, organizing, and scheduling agency trainings.

**8.2. Organizational Standards Technical Assistance:** Does the state have in place Technical Assistance Plans (TAPs) in place for all eligible entities with unmet organizational standards, if appropriate?

☒ Yes ☐ No

As of the date this State Plan was submitted, none of Iowa's community action agencies have a TAP or QIP in place for unmet CSBG organizational standards.

**Note:** This information is associated with State Accountability Measure 6Sb.

**8.2a. Address Unmet Organizational Standards:** Describe the state's plan to provide training and/or technical assistance to eligible entities to ensure they address unmet organizational standards.

N/A

**8.3. Training and Technical Assistance Organizations:** Indicate the types of organizations through which the state intends to provide training and/or technical assistance as described in item 8.1, and briefly describe their involvement. **[Check all that apply]**

- ☐ All training and technical assistance is conducted by the state
- ☐ CSBG eligible entities (if checked, provide the expected number of CSBG eligible entities to receive funds)
- ☐ Other community-based organizations
- ☒ State Community Action association
- ☐ Regional CSBG technical assistance provider(s)
- ☐ National technical assistance provider(s)
- ☐ Individual consultant(s)
- ☐ Tribes and Tribal Organizations
- ☐ Other, specify:

**8.4. CSBG Funded Training and Technical Assistance Performance Management Adjustment:** Describe adjustments the state made to the training and technical assistance plan under this State Plan as compared to past State Plans. Any adjustment should be based on the state's analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the state is not making any adjustments, provide further detail.

On Iowa's 2021 American Customer Satisfaction Index (ACSI) Eligible Entities Satisfaction with the States Survey report, the State CSBG Office scored 92 for Training and Technical Assistance. Within the Training and Technical Assistance category, the State CSBG Office scored a 98 for Responsiveness of Staff, which was a national maximum.

Since 2017, the State CSBG Office's Training and Technical Assistance scores have been 92 or higher. ACSI scores of 80-89 are considered excellent, 90-100 exceptional.

Based on a review of the ACSI scores, the State CSBG Office is not making any changes to how it provides T/TA to Iowa's community action agencies. The State CSBG Office will continue its practices of providing timely CSBG guidance and administrative assistance to the agencies, will continue to collaborate with the Iowa Community Action Association (ICAA) in planning and delivering T/TA to the agencies, and will provide financial support and resources for the FFY 2022 and FFY 2023 ICAA Annual Conferences (see Section 8 (8.1)).

In past State Plans, the Training and Technical Assistance Plan was only for describing CSBG remainder/discretionary funded T/TA. Since Iowa's CSBG Program does not have remainder/discretionary funds, that requirement did not apply to our state. For this State Plan, the Training and Technical Assistance Plan is for describing CSBG remainder/discretionary funded or state administration funded T/TA. As a result of this change, this is our state's first State Plan that includes a Training and Technical Assistance Plan and a CSBG funded T/TA performance management response.

## SECTION 9

### State Linkages and Communication

**Note:** This section describes activities that the state may support with CSBG remainder/discretionary funds, described under Section 675C(b)(1) of the CSBG Act. The state may indicate planned use of remainder/discretionary funds for linkage/communication activities in Section 7, State Use of Funds, items 7.9(b) and (c).

- 9.1. State Linkages and Coordination at the State Level:** Describe the linkages and coordination at the state level that the state intends to create or maintain to ensure increased access to CSBG services to low-income people and communities under this State Plan and avoid duplication of services (as required by the assurance under Section 676(b)(5)) of the CSBG Act. Describe additional information as needed. **[Check all that apply]**

- ☒ State Low Income Home Energy Assistance Program (LIHEAP) office
- ☒ State Weatherization office
- ☒ State Temporary Assistance for Needy Families (TANF) office
- ☒ State Head Start Collaboration office
- ☒ State public health office
- ☒ State education department
- ☒ State Workforce Innovation and Opportunity Act (WIOA) agency
- ☒ State budget office
- ☐ Supplemental Nutrition Assistance Program (SNAP)
- ☐ State child welfare office
- ☒ State housing office
- ☐ Other, specify:

**Note:** This response will link to the corresponding CSBG assurance, item 14.5. In addition, this item is associated with State Accountability Measure 7Sa.

- 9.2. State Linkages and Coordination at the Local Level:** Describe how the state is encouraging partnerships and collaborations at the state level with public and private sector organizations, to assure the effective delivery and coordination of CSBG services to transform low-income communities and avoid duplication of services (as required by assurances under Sections 676(b)(5) and (b)(6)) of the CSBG Act.

The State CSBG Office collaborates and coordinates efforts with public and private organizations. In addition to the State CSBG Office's state level partnerships, the Administrator of the State CSBG Office and/or his staff serve on the following committees and/or partner with the following organizations and groups that represent and make decisions that affect low-income individuals, families, and communities:

- Family Development and Self-Sufficiency Council
- Iowa Family Development Alliance
- Iowa Council on Homelessness
- Early Childhood Iowa
- Iowa Coalition Against Domestic Violence
- Prevent Child Abuse Iowa
- Iowa Legal Aid
- Federal Home Visitation Advisory Committee (MIECHV)
- National Resource Center for Family Centered Practices (University of Iowa)
- Iowa Community Action Association
- Iowa Community Action Association Conference Training Committee
- Iowa Weatherization Assistance Coordinators
- Iowa Directors of Energy Assistance
- Iowa ROMA Subgroup
- Region VII Regional Performance Innovation Consortia (RPIC)

The State CSBG Office's involvement in and connections to these committees and groups results in increased coordination of programs, services, and initiatives, and assures that decisions affecting Iowa's low-income population are considered.

**Note:** This response will link to the corresponding CSBG assurances, items 14.5 and 14.6.

### 9.3. Eligible Entity Linkages and Coordination

- 9.3a. State Assurance of Eligible Entity Linkages and Coordination:** Describe how the state will assure that the eligible entities will partner and collaborate with public and private sector organizations to assure the effective delivery and coordination of CSBG services to low-income people and communities and avoid duplication of services (as required by the assurance under Section 676(b)(5)) of the CSBG Act.

Iowa's community action agencies, as part of their CSBG Community Action Plan and Application, are required to explain how their agency will assure coordination with governmental and other social services organizations that provide employment and training services to ensure that the employment services are delivered affectively and without duplication, and how their agency will coordinate with their local WIOA partners. Agencies are also required to sign a certification statement acknowledging that their agency understands and agrees to this CSBG assurance.

All agencies have processes in place for establishing linkages between governmental and other social services organizations in order to better coordinate the effective delivery of services to low-income individuals and families and to avoid the duplication of services. Although agencies report different processes for establishing linkages, all agencies participate in community meetings, planning coalitions, and network with state and local service providers. Through these efforts, agencies are able to establish formal and informal agreements and coordinate information with governmental and social services organizations. These coordination efforts help the agencies avoid the unnecessary duplication of programs, services, and community initiatives.

In FFY 2020, Iowa's agencies reported actively working with 5,935 public and private organizations to expand resources and opportunities in order to achieve family and community outcomes.

The State CSBG Office's CSBG program operations reviews and CSBG organizational standards assessments (CSBG Organizational Standard 2.1) include verifying the agency's community-wide partnerships and the purpose for each of those partnerships.

**Note:** This response will link to the corresponding CSBG assurance, item 14.5.

- 9.3b. State Assurance of Eligible Entity Linkages to Fill Service Gaps:** Describe how the eligible entities will develop linkages to fill identified gaps in the services, through the provision of information, referrals, case management, and follow-up consultations, according to the assurance under Section 676(b)(3)(B) of the CSBG Act.

Iowa's community action agencies, as part of their CSBG Community Action Plan and Application, are required to describe how their agency will coordinate with other organizations to ensure low-income individuals and families receive the necessary and appropriate assistance they are seeking, including information about their agency's information and referral processes.

All agencies have processes in place for developing, creating, and maintaining partnerships and linkages that are essential for addressing service gaps and ensuring service duplication is avoided. Although agencies report different processes for developing partnerships, all agencies participate in community meetings, planning coalitions, and network with state and local service providers. Through these meetings and networking, agencies gather information regarding other community services available and develop contacts in their communities. These processes ensure that agency clients receive current information and referrals regarding community services.

The State CSBG Office's CSBG program operations reviews and CSBG organizational standards assessments (CSBG Organizational Standard 2.1) include verifying the agency's community-wide partnerships and the purpose for each of those partnerships.

**Note:** This response will link to the corresponding CSBG assurance, item 14.3b.

- 9.4. Workforce Innovation and Opportunity Act (WIOA) Employment and Training Activities:** Does the state intend to include CSBG employment and training activities as part of a WIOA Combined State Plan, as allowed under the Workforce Innovation and Opportunity Act (as required by the assurance under Section 676(b)(5) of the CSBG Act)?

☐ Yes ☒ No

**Note:** This response will link to the corresponding CSBG assurance, item 14.5.

- 9.4a. WIOA Combined Plan:** If the state selected “yes” under item 9.4, provide the CSBG-specific information included in the State’s WIOA Combined Plan. This information includes a description of how the state and the eligible entities will coordinate the provision of employment and training activities through statewide and local WIOA workforce development systems. This information may also include examples of innovative employment and training programs and activities conducted by community action agencies or other neighborhood-based organizations as part of a community antipoverty strategy.

N/A

- 9.4b. Employment and Training Activities:** If the state selected “no” under item 9.4, describe the coordination of employment and training activities, as defined in Section 3 of WIOA, by the state and by eligible entities providing activities through the WIOA system.

Iowa's Department of Workforce Development is the lead agency for planning and implementation of the Unified Plan for WIOA. The Iowa Department of Human Rights (IDHR) and its Division of Community Action Agencies (DCAA) are involved in the following WIOA activities:

The IDHR's Division of Community Advocacy and Services and its Client Assistance Program (CAP) work extensively with WIOA rules and regulations and their impact on individuals with disabilities, with an emphasis on youth with disabilities seeking and obtaining gainful, competitive, integrated employment. CAP is authorized to monitor implementation and compliance of policy regulated by WIOA affecting Iowa Vocational Rehabilitation Services, Iowa Department for the Blind, Iowa's six Centers for Independent Living, and Community Rehabilitation Programs that receive funding under the Rehabilitation Act.

CAP also represents the IDHR as a member of the State Rehabilitation Council as well as in partnership and collaboration with a variety of state, local and private sector partners.

In Iowa, the community action agencies coordinate employment and training activities with their local IowaWorks Centers and IWD's PROMISE JOBS program (Promoting Independence and Self-Sufficiency through Employment). PROMISE JOBS is Iowa's welfare reform employment program designed to assist Iowa's Family Investment Program (FIP) recipients to become self-sufficient. These coordinated partnerships help provide equal access to employment and training opportunities to low-income individuals and families. Some of the opportunities available to agency clients through these coordination efforts include: job placement and recruitment, job loss assistance, training assistance, personal development, and employment related supports.

- 9.5. Emergency Energy Crisis Intervention:** Describe how the state will assure, where appropriate, that emergency energy crisis intervention programs under title XXVI (relating to Low-Income Home Energy Assistance) are conducted in each community in the State, as required by the assurance under Section 676(b)(6) of the CSBG Act).

The Administrator of the State CSBG Office also administers the State Low-Income Home Energy Assistance Program (LIHEAP) Office. The State LIHEAP Office administers LIHEAP by contracting with Iowa's 16 community action agencies.

Iowa's LIHEAP is a statewide program that assists qualifying low-income households in the payment of a portion of their winter heating costs and encourages energy conservation through client education and weatherization. A component of Iowa's LIHEAP is the Emergency Crisis Intervention Program (ECIP). ECIP provides immediate assistance to households to alleviate life-threatening situations. ECIP payments are made for repair or replacement of a furnace or heating system, obtaining temporary shelter, emergency fuel deliveries, purchasing or repairing air conditioning equipment when medically necessary, purchasing blankets and/or heaters, purchasing fans, and transporting clients to cooling centers during times of extreme heat.

All agencies receive an annual LIHEAP monitoring review and evaluation to ensure compliance with LIHEAP regulations. The State LIHEAP Office Program Manager and Program Planner conduct the reviews.

A number of agencies also receive emergency energy crisis intervention funds through General Relief, United Way, Salvation Army, County Relief, Embrace Iowa, Emergency Solutions Grants Program, Emergency Food and Shelter National Board Program, churches, ministerial associations, local utilities, and customer contribution funds. These funds are used for emergency payment arrangements with local utilities, emergency fuel deliveries, and reconnection services.

**Note:** This response will link to the corresponding CSBG assurance, item 14.6.

- 9.6. Faith-based Organizations, Charitable Groups, and Community Organizations:** Describe how the state will assure local eligible entities will coordinate and form partnerships with other organizations, including faith-based organizations, charitable groups, and community organizations, according to the state's assurance under Section 676(b)(9) of the CSBG Act.

Iowa's community action agencies, as part of their CSBG Community Action Plan and Application, are required to explain how their agency will assure coordination and partnerships with other organizations, including faith-based organizations, charitable groups, and community organizations that serve low-income individuals and families. Agencies are also required to sign a certification statement acknowledging that their agency understands and agrees to this CSBG assurance.

All agencies have processes in place for developing partnerships and coordinating programs and services. Although agencies report different processes, all agencies participate in community meetings, planning coalitions, and network with state and local service providers. Through these meetings, coalitions, and networking, agencies share and receive information regarding services and resources for low-income individuals and families, and develop partnerships and coordinate with other anti-poverty organizations in their communities. These partnerships help ensure their clients will receive current information and referrals regarding available services and assistance.

In FFY 2020, Iowa's agencies reported actively working with 5,935 public and private organizations to expand resources and opportunities in order to achieve family and community outcomes. Of those organizations, 1,141 were no-profit organizations and 752 were faith-based organizations.

The State CSBG Office's CSBG program operations reviews and CSBG organizational standards assessments (CSBG Organizational Standard 2.1) include verifying the agency's community-wide partnerships and the purpose for each of those partnerships.

**Note:** this response will link to the corresponding assurance, item 14.9

**9.7 Coordination of Eligible Entity 90 Percent Funds with Public/Private Resources:** Describe how the eligible entities will coordinate CSBG 90 percent funds with other public and private resources, according to the assurance under Section 676(b)(3)(C) of the CSBG Act.

Iowa's community action agencies, as part of their CSBG Community Action Plan and Application, are required to describe how their agency coordinates their CSBG funds or CSBG funded resources (i.e. office space, equipment, supplies, staff time) with public resources (i.e. city and county governments) and with private resources (i.e. foundations, corporations, non-profit organizations).

All agencies receive public and private funding, in-kind goods and services, and donations. In FFY 2020, agencies reported receiving over \$237 million in federal, state, public, and private resources. Of the \$237 million in resources, the following was leveraged from public and private entities:

\$ 2,207,173 – leveraged public (local) funding  
\$ 1,720,399 – value of in-kind goods/services received from local government  
\$ 16,124,692 – leveraged private funding  
\$ 17,275,290 – value of donated items (food, clothing, furniture, etc.)  
\$ 6,978,150 – value of in-kind services received from businesses

\$ 44,305,704 – TOTAL public (local) and private resources leveraged

Most agencies will use their public and private resources and CSBG funding to support their outreach services and outreach operation costs. Some outreach services supported by these funds and resources include: emergency food assistance, disaster and crisis assistance, utility assistance, rent assistance, case management services, prescription drugs, school supplies, household items, and clothing.

Agencies will also coordinate their public and private resources and CSBG funding to support, enhance, or expand agency programs, services, and initiatives, and to meet matching or cost sharing requirements in order to leverage additional federal and state funding.

**Note:** this response will link to the corresponding assurance, item 14.3c.

**9.8. Coordination among Eligible Entities and State Community Action Association:** Describe state activities for supporting coordination among the eligible entities and the State Community Action Association.

The State CSBG Office partners and coordinates with the Iowa Community Action Association (ICAA) and Iowa's community action agencies on the following Community Action and CSBG initiatives:

- **State Plan Development:** The State CSBG Office includes ICAA and the agencies in the development of the State Plan. See Section 3 (3.4a) for a description of the steps the State CSBG Office took to involve ICAA and the agencies.
- **ICAA's Legislative Agenda:** Each year the ICAA governing board develops their legislative action and advocacy plan. ICAA includes the State CSBG Office and the Iowa Commission on Community Action Agencies (the State CSBG Office's governing board) in their legislative agenda and policy interests discussions.
- **Iowa Commission on Community Action Agencies' Legislative Agenda:** Each year the commission makes recommendations to the Governor and Iowa's General Assembly for executive and legislative action designed to improve the status of low-income people in the State. The commission includes ICAA in the development and implementation of the agenda.
- **Iowa Commission on Community Action Agencies' Commission Meetings:** At each commission meeting, the State CSBG Office presents and discusses its programs and provides Community Action updates, and ICAA presents information about their programs, services, activities, and events.



- The ICAA Annual Conference: The State CSBG Office Program Managers are members of the ICAA conference planning committee, and the State CSBG Office provides funding and resources for conference training needs, workshop speakers, and recognition awards.
- The Administrator of the State CSBG Office and ICAA staff serve on the Region VII Regional Performance Innovation Consortia (RPIC). The Region VII RPIC provides training and technical assistance, coordinates state, regional and national efforts, and disseminates information on CSBG Organizational Standards, Results-Oriented Management and Accountability (ROMA), and Evidence-Based/Evidence-Informed Service Strategies.
- State Training and Technical Assistance (T&TA) Plan: The State CSBG Office collaborates with ICAA on the planning and development of the State's comprehensive T&TA Plan.
- Iowa Community Action Agency Trainings: The State CSBG Office works with ICAA on identifying agency training needs and assisting ICAA on developing, organizing, and scheduling agency trainings.
- The Administrator of the State CSBG Office and the State CSBG Office Program Managers attend and present Community Action and CSBG information at the ICAA board meetings and the agencies' ROMA Subgroup meetings.
- Needs Assessment Committee: The committee consists of 7 members (both State CSBG Office Program Managers, the ICAA Training Director, and 4 agency staff). The committee is responsible for designing client and community surveys, developing instructions and guidance for administering the surveys, and creating statewide reports using the survey results.
- Agency Client Tracking Systems: The State CSBG Office and ICAA work the agencies and the agencies' client tracking system vendors to ensure the systems track, collect, and report individual, family, and community level data, information, and outcomes.

**9.9. Communication with Eligible Entities and the State Community Action Association:** In the table below, describe how the state intends to communicate with eligible entities, the State Community Action Association, and other partners under this State Plan on the topics listed. For any topic that is not applicable, select "Not Applicable" under Expected Frequency.

<b>Communication Plan</b>		
<b>Subject Matter</b>	<b>Expected Frequency</b>	<b>Format</b>
Upcoming Public and/or Legislative Hearings	As Needed	Meetings, Email
State Plan Development	As Needed	Meetings, Email
Organizational Standards Progress	Annually	1:1, Email, Phone Calls, Letters
State Accountability Measures Progress	Annually	Meetings, Email
Community Needs Assessments/Community Action Plans	Annually	1:1, Email, Phone Calls, Letters
State Monitoring Plans and Policies	Annually	Meetings, Email
Training and Technical Assistance (T/TA) Plans	As Needed	1:1, Email, Phone Calls, Letters
ROMA and Performance Management	Semi-Annually	1:1, Email, Phone Calls, Letters
State Interagency Coordination	As Needed	Meetings, Email, Phone Calls
CSBG Legislative/Programmatic Updates	Quarterly	Meetings, Email, Website, Webinars

### Communication Plan

Subject Matter	Expected Frequency	Format
Tripartite Board Requirements	Annually	1:1, Email, Phone Calls, Letters
State Training and Technical Assistance Plan	As Needed	Meetings, Email
Iowa Community Action Association Conference Planning	As Needed	Meetings, Email, Webinars, Phone Calls
Iowa Commission on Community Action Agencies	Quarterly	Meetings, Webinars, Phone Calls

- 9.10. Feedback to Eligible Entities and State Community Action Association:** Describe how the state will provide information to local entities and the State Community Action Association regarding performance on State Accountability Measures.

The State CSBG Office will send via e-mail, to the Iowa Community Action Association (ICAA) and Iowa's community action agencies, the information and feedback received from the Office of Community Services (OCS) about the State CSBG Office's performance on the state accountability measures. The e-mail will be sent within 60 calendar days of receipt of the information and feedback from OCS.

The State CSBG Office will present the state accountability measures information and feedback to ICAA and the agencies' Executive Directors at an ICAA governing board meeting, and to the members of the ROMA Subgroup at one of their meetings.

**Note:** This information is associated with State Accountability Measure 5S(iii).

- 9.11. Communication Plan Performance Management Adjustment:** Describe any adjustments the state made to the Communication Plan in this State Plan as compared to past State Plans. Any adjustment should be based on the state's analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the state is not making any adjustments, provide further detail.

On Iowa's 2021 American Customer Satisfaction Index (ACSI) Eligible Entities Satisfaction with the States Survey report, the State CSBG Office scored a 96 for Communication. Within the Communication category, the State CSBG Office scored the following:

- 97 Responsiveness of Staff to Requests
- 97 Sufficiency of Information
- 97 Usefulness of Feedback
- 96 Consistency of Responses
- 94 Clarity of Communication
- 94 Frequency of Communication

ASCI scores of 80-89 are considered excellent, 90-100 exceptional.

The following communication goals are in Iowa's FFY 2020-2021 CSBG State Plan and Application:

#### COMMUNICATION

1. The Administrator of the State CSBG Office will attend and report on the State CSBG Office's programs at all Iowa Community Action Association Board of Director meetings.
2. At least one State CSBG Office Program Manager will attend and present a CSBG program report at all Iowa community action agency ROMA Subgroup meetings.

The State CSBG Office met its communication goals in FFY 2020, and as of the date this State Plan was submitted, was meeting its goals in FFY 2021.

Also, as of the date this State Plan was submitted, the State CSBG Office was meeting all of the planned actions in its FFY 2020-2021 Communication Plan. See Iowa's FFY 2020-2021 CSBG State Plan and Application – Section 9 (9.9. Communication Plan).

Based on a review of the scores and results, the State CSBG Office is not making any changes to its communication plans and efforts.

**Note:** This information is associated with State Accountability Measures 7Sb.

**SECTION 10**  
**Monitoring, Corrective Action, and Fiscal Controls**

**Monitoring of Eligible Entities** (Section 678B(a) of the CSBG Act)

- 10.1.** Specify the proposed schedule for planned monitoring visits including: full onsite reviews; onsite reviews of newly designated entities; follow-up reviews - including return visits to entities that failed to meet state goals, standards, and requirements; and other reviews as appropriate.

This is an estimated schedule to assist states in planning. States may indicate “no review” for entities the state does not plan to monitor in the performance period.

**Monitoring Schedule**

CSBG Eligible Entity	Monitoring Type	Review Type	Target Quarter	Start Date of Last Full Onsite Review	End Date of Last Full Onsite Review	Brief Description of “Other”
	<ul style="list-style-type: none"> <li>• Full Onsite</li> <li>• Newly Designated</li> <li>• Follow-up</li> <li>• Other</li> <li>• No review</li> </ul>	<ul style="list-style-type: none"> <li>• Onsite Review</li> <li>• Desk Review</li> </ul>	<ul style="list-style-type: none"> <li>• FY1 Q1</li> <li>• FY1 Q2</li> <li>• FY1 Q3</li> <li>• FY1 Q4</li> <li>• FY2 Q1</li> <li>• FY2 Q2</li> <li>• FY2 Q3</li> <li>• FY2 Q4</li> </ul>			

The attached information will be included in the table:  
Attachment K: Monitoring of CSBG Eligible Entities

**Note:** This information is associated with State Accountability Measure 4Sa(i).

- 10.2. Monitoring Policies:** Provide a copy of state monitoring policies and procedures by attaching and/or providing a hyperlink.

Attachment L: Monitoring Policies  
Iowa CSBG Policies and Procedures Manual (7-2-2018):

- CSBG Program Reviews (pages 25-33)
- Fiscal Monitoring (page 34)

- 10.3. Initial Monitoring Reports:** According to the state’s procedures, by how many calendar days must the state disseminate initial monitoring reports to local entities?

60 calendar days

**Note:** This information is associated with State Accountability Measure 4Sa(ii).

**Corrective Action, Termination and Reduction of Funding and Assurance Requirements** (Section 678C of the Act)

- 10.4. Closing Findings:** Are state procedures for addressing eligible entity findings/deficiencies, and the documenting closure of findings included in the State monitoring policies attached under 10.2?

☒ Yes ☐ No

**10.4a. Closing Findings Procedures:** If no, describe state procedures for addressing eligible entity findings/deficiencies, and the documenting closure of findings.

N/A

**10.5. Quality Improvement Plans (QIPs):** Provide the number of eligible entities currently on QIPs, if applicable.

0 (none)

**10.6. Reporting of QIPs:** Describe the state's process for reporting eligible entities on QIPs to the Office of Community Services within 30 calendar days of the state approving a QIP.

The State CSBG Office will determine through CSBG program operations reviews, CSBG organizational standards assessments, CSBG fiscal monitoring reviews, State CSBG Office investigations related to specific complaints or allegations, and other necessary and appropriate reviews, whether or not an Iowa community action agency is meeting the performance goals, administrative standards, service delivery requirements, financial management requirements, and other requirements established by the Office of Community Services (OCS), the State of Iowa, and the State CSBG Office. When the State CSBG Office determines that an agency has significant deficiencies, the State CSBG Office will require the agency to develop and implement a quality improvement plan (QIP) to correct the deficiencies. The State CSBG Office will adhere to the QIP requirements in Section 678C of the CSBG Act and the federal guidance provided in OCS, CSBG Information Memorandum, Transmittal No. 116 when requiring an agency to develop and implement a QIP.

All agency QIPs, approved by the State CSBG Office, will be reported to OCS within 30 calendar days of the State CSBG Office's approval decision. As directed, the State CSBG Office will notify its OCS, CSBG Program Services, Program Specialist.

**Note:** This information is associated with State Accountability Measure 4Sa(iii).

**10.7. Assurance on Funding Reduction or Termination:** The state assures that "any eligible entity that received CSBG funding the previous fiscal year will not have its funding terminated or reduced below the proportional share of funding the entity received in the previous fiscal year unless, after providing notice and an opportunity for a hearing on the record, the state determines that cause exists for such termination or such reduction, subject to review by the Secretary as provided in Section 678C(b)" per Section 676(b)(8) of the CSBG Act.

☒ Yes ☐ No

**Note:** This response will link with the corresponding assurance under item 14.8.

#### **Policies on Eligible Entity Designation, De-designation, and Re-designation**

**10.8. Eligible Entity Designation:** Does the state CSBG statute and/or regulations provide for the designation of new eligible entities?

☒ Yes ☐ No

**10.8a. New Designation Citation:** If yes, provide the citation(s) of the law and/or regulation.

2021 Iowa Code 216A.93 (state legislation)  
Iowa Administrative Code 427-22.12 (state regulation)

**10.8b. New Designation Procedures:** If no, describe state procedures for the designation of new eligible entities and how the procedures were made available to eligible entities and the public.

N/A

**10.9. Eligible Entity Termination:** Does the state CSBG statute and/or regulations provide for termination of eligible entities?

☐ Yes ☒ No

**10.9a. Termination Citation:** If yes, provide the citation(s) of the law and/or regulation.

N/A

**10.9b. Termination Procedures:** If no, describe state procedures for termination of eligible entities and how the procedures were made to available eligible entities and the public.

The State CSBG Office will adhere to the requirements in Section 678C of the CSBG Act and the federal guidance provided in Office of Community Services (OCS), CSBG Information Memorandum, Transmittal No. 116 to terminate the designation of CSBG eligible entities.

The State CSBG Office's procedures are described and made available to Iowa's community action agencies through Iowa's CSBG State Plan and Application and Iowa's CSBG policies and procedures manual. The State Plan, manual, CSBG Act, and OCS, CSBG Information Memorandum, Transmittal No. 116 are available for agencies on the State CSBG Office's website.

The State CSBG Office's procedures are made available to the public through Iowa's CSBG State Plan and Application. The State Plan is available for the public on the State CSBG Office's website.

**10.10. Eligible Entity Re-Designation:** Do the state CSBG statute and/or regulations provide for re-designation of an existing eligible entity?

☐ Yes ☒ No

**10.10a. Re-Designation Citation:** If yes, provide the citation(s) of the law and/or regulation.

N/A

**10.10b. Re-Designation Procedures:** If no, describe the state procedures for re-designation of existing eligible entities and how the procedures were made available to eligible entities and the public.

The State CSBG Office will adhere to the requirements in Section 676A of the CSBG Act and the federal guidance provided in Office of Community Services (OCS), CSBG Information Memorandum, Transmittal No. 42 to re-designate CSBG eligible entities.

The State CSBG Office's procedures are described and made available to Iowa's community action agencies through Iowa's CSBG State Plan and Application and Iowa's CSBG policies and procedures manual. The State Plan, manual, CSBG Act, and OCS, CSBG Information Memorandum, Transmittal No. 42 are available for agencies on the State CSBG Office's website.

The State CSBG Office's procedures are made available to the public through Iowa's CSBG State Plan and Application. The State Plan is available for the public on the State CSBG Office's website.

## Fiscal Controls and Audits and Cooperation Assurance

- 10.11. Fiscal Controls and Accounting:** Describe how the state's fiscal controls and accounting procedures will a) permit preparation of the SF-425 federal fiscal reports (FFR) and b) permit the tracing of expenditures adequate to ensure funds have been used appropriately under the block grant, as required by block grant regulations applicable to CSBG at 45 CFR 96.30(a).

Integrated Information for Iowa (I/3) is the State of Iowa's Enterprise Resource Planning system. I/3 supports Iowa's financial processes such as accounts payable, accounts receivable, procurement, general accounting, fixed assets, budget preparation, and applicant tracking.

The I/3 system requires at least two I/3 authorized individuals to approve each expenditure (claim for payment) that is entered into the system.

The I/3 system allows authorized individuals to download information into I/3's Data Warehouse software program. From the I/3 Data Warehouse, Iowa Department of Human Rights (IDHR), Central Administration accountants are able to query reports for financial information which enables the accountants to complete monthly revenue and expenditure reports in electronic spreadsheets (IDHR Report of Expenditures) with varying degrees of needed detail. The I/3 Data Warehouse allows the accountants to complete the SF-425 federal fiscal reports accurately and timely.

The IDHR, Central Administration adheres to the State of Iowa's payment policies and procedures in the State Accounting Policy and Procedures Manual, the State of Iowa's purchasing rules and guidelines, and uses the Office of Management and Budget, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for guidance on allowable and unallowable costs.

Annually, Iowa's community action agencies receive a CSBG fiscal monitoring review and evaluation to determine financial management stability and compliance with CSBG regulations, contracts, procedures, and other requirements established by the State of Iowa and the State CSBG Office. The reviews include an examination and review of financial transactions, time sheets, management level compensation, interest earned documentation, indirect cost rate and cost allocation applications, and monthly funding requests and advances.

- 10.12. Single Audit Management Decisions:** Describe state procedures for issuing management decisions for eligible entity single audits, as required by block grant regulations applicable to CSBG at 45 CFR 75.521.

The following are the Iowa Department of Human Rights (IDHR), Central Administration's procedures for issuing management decisions for Iowa community action agency annual audits:

Iowa's community action agencies are required to contract with an independent auditing firm. The auditing firm's Certified Public Accountants are required to audit all agency programs annually, including the CSBG Program.

The auditing firm is required to submit a completed audit to the agency. The agency is required to provide that audit to the IDHR, Central Administration, as directed in the agency's CSBG contract. The IDHR, Central Administration reviews all agency annual audits.

Once the IDHR, Central Administration receives an agency audit, IDHR accountants will:

- document the receipt of the audit,
- review all findings and questioned costs in the audit (if applicable),
- review the expenditures reported in the audit, and
- issue a response letter to the agency within 180 calendar days of receipt of the audit.

The response letter will notify the agency if the provisions in their IDHR contracts have been met and generally accepted accounting principles followed. Any audit issues or findings related to the agency's IDHR contracts will be communicated in the response letter along with the necessary corrective action requirements. The Office of Auditor of State reviews IDHR, Central Administration's audit review procedures annually. The Office of Auditor of State also audits the IDHR annually for compliance with the requirements of laws, regulations, contracts, and grant applications. The audit of compliance is conducted in accordance with U. S. Generally Accepted Auditing Principles, the standards applicable to financial audits contained in Government Auditing Standards as issued by the Comptroller General of the United States, and the Office of Management and Budget, Uniform Administrative Requirements, Cost Principles, and Audit Requirements.

**Note:** This item is associated with State Accountability Measure 4Sd.

- 10.13. Assurance on Federal Investigations:** The state will "permit and cooperate with federal investigations undertaken in accordance with Section 678D" of the CSBG Act, as required by the assurance under Section 676(b)(7) of the CSBG Act.

☒ Yes ☐ No

**Note:** This response will link with the corresponding assurance, item 14.7.

- 10.13a. Federal Investigations Policies:** Are state procedures for permitting and cooperating with federal investigations included in the state monitoring policies attached under 10.2?

☐ Yes ☒ No

- 10.14. Monitoring Procedures Performance Management Adjustment:** Describe any adjustments the state made to monitoring procedures in this State Plan as compared to past State Plans. Any adjustment should be based on the state's analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the state is not making any adjustments, provide further detail.

On Iowa's 2021 American Customer Satisfaction Index (ACSI) Eligible Entities Satisfaction with the States Survey report, the State CSBG Office scored a 96 for Monitoring and Corrective Action. Within the Monitoring and Corrective Action category, the State CSBG Office scored the following:

- 99 Adherence to Plan
- 97 Clarity of Feedback
- 97 Clarity of Process
- 97 Timeliness of Feedback
- 94 Consistency of Monitoring
- 92 Usefulness of Visits

ASCI scores of 80-89 are considered excellent, 90-100 exceptional.

The following monitoring goals are in Iowa's FFY 2020-2021 CSBG State Plan and Application:

**MONITORING**

1. The State CSBG Office will conduct CSBG program operations onsite reviews at:
  - a. 5 of 17 agencies in FFY 2020
  - b. 6 of 17 agencies in FFY 2021
2. The State CSBG Office will conduct CSBG organizational standards onsite assessments at:
  - a. 5 of 17 agencies in FFY 2020
  - b. 6 of 17 agencies in FFY 2021
3. The State CSBG Office will conduct CSBG organizational standards agency self-assessment desk-reviews for:
  - a. 12 of 17 agencies in FFY 2020
  - b. 11 of 17 agencies in FFY 2021



4. The State CSBG Office will complete and issue a CSBG program operations onsite review report within 60 calendar days of an agency's onsite review exit meeting date.
5. The State CSBG Office will complete and issue a CSBG organizational standards onsite assessment report within 60 calendar of an agency's onsite assessment exit meeting date.
6. The State CSBG Office will complete and issue a CSBG organizational standards agency self-assessment validation letter or report within 60 calendar days of receipt of an agency's self-assessment.

The State CSBG Office conducted four CSBG program operation reviews and CSBG organizational standards assessments in FFY 2020. The review and assessment that was planned but not completed during FFY 2020 was completed during the first quarter of FFY 2021. The State CSBG Office met all of its other monitoring goals in FFY 2020, and as of the date this State Plan was submitted, was meeting its FFY 2021 monitoring goals.

Based on a review of the scores and results, the State CSBG Office is not making any changes to its monitoring and corrective action procedures and activities.

**Note:** This item is associated with State Accountability Measure 4Sb.

**SECTION 11**  
**Eligible Entity Tripartite Board**

- 11.1. Tripartite Board Verification:** Verify which of the following measures are taken to ensure that the state verifies CSBG eligible entities are meeting tripartite board requirements under Section 676B(a)(2) of the CSBG Act. **[Check all that apply]**

- ☐ Attend board meetings
- ☒ Organizational standards assessment
- ☒ Monitoring
- ☒ Review copies of board meeting minutes
- ☐ Track board vacancies/composition
- ☐ Other, describe:

- 11.2. Tripartite Board Updates:** Provide how often the state requires eligible entities (which are not on TAPs or QIPs) to provide updates regarding their tripartite boards. This includes but is not limited to copies of meeting minutes, vacancy alerts, changes to bylaws, low-income member selection process, etc. **[Select one]**

- ☒ Annually
- ☐ Semiannually
- ☐ Quarterly
- ☐ Monthly
- ☐ Other, describe:

- 11.3. Tripartite Board Representation Assurance:** Describe how the state will verify that eligible entities have policies and procedures by which individuals or organizations can petition for adequate representation on an eligible entity's tripartite board as required by the assurance under Section 676(b)(10) of the CSBG Act.

Iowa's community action agencies, as part of their annual CSBG Community Action Plan and Application, certify that their agency has procedures in place that meet the requirements in Section 676(b)(10) of the CSBG Act. The State CSBG Office also has CSBG contract requirements and written policies specific to this CSBG Act assurance.

As part of the State CSBG Office's CSBG program operations reviews, the agency's by-laws and governing board materials are reviewed to ensure the agency has written procedures in place that meet the requirements of this assurance.

**Note:** This response will link with the corresponding assurance, item 14.10.

- 11.4. Tripartite Board Alternative Representation:** Does the state permit public eligible entities to use, as an alternative to a tripartite board, "another mechanism specified by the state to assure decision-making and participation by low-income individuals in the development, planning, implementation, and evaluation of programs" as allowed under Section 676B(b)(2) of the CSBG Act?

- ☒ Yes ☐ No

**11.4a.** If yes, describe the mechanism used by public eligible entities as an alternative to a tripartite board.

The State CSBG Office has written policies that allow public community action agencies to use another governing board mechanism as an alternative to a tripartite governing board. The following policy is included in Iowa's CSBG policies and procedure manual:

Iowa's public agencies may submit a request to use another governing board mechanism as an alternative to a tripartite governing board. The requested mechanism must assure decision making and participation by low-income individuals in the development, planning, implementation, and evaluation of programs funded under the CSBG Act. The requested mechanism must also meet the requirements in the Iowa Code (Chapter 216A.94). Public agencies interested in using another governing board mechanism must contact the State CSBG Office for request and submittal instructions. Public agencies are not allowed to implement and use a mechanism that has not been approved (in writing) by the State CSBG Office.

As of October 1, 2020, all of Iowa's community action agencies are private nonprofit organizations.

**SECTION 12**  
**Individual and Community Income Eligibility Requirements**

**12.1. Required Income Eligibility:** Provide the income eligibility threshold for services in the State. **[Select one]**

- ☒ 125% of the HHS poverty line
- ☐ X % of the HHS poverty line (fill in the threshold): \_\_\_\_\_ %
- ☐ Varies by eligible entity (include narrative)

**12.1a.** Describe any state policy and/or procedures for income eligibility, such as treatment of income and family/household composition.

The following policies are included in Iowa's CSBG policies and procedure manual:

**CLIENT INCOME VERIFICATION AND ELIGIBILITY**

Iowa's community action agencies are required to use 125% of the current U. S. Department of Health and Human Services (HHS) Poverty Guidelines as the ceiling for determining a client's eligibility for CSBG funded services or benefits.

Agencies providing CSBG funded services or benefits to clients are required to verify the client's income. Agencies must use Iowa's Low-Income Home Energy Assistance Program (LIHEAP) procedures for verifying the income (see the State of Iowa-LIHEAP Procedures Manual). Once the income has been verified, the agency must use the current HHS Poverty Guidelines for determining the client's eligibility for the CSBG services or benefits.

**Income Eligibility for General/Short Term Services:**

For emergency and non-emergency general/short term CSBG funded services or benefits, agencies can use proxy income verification procedures (obtaining a client's income verification through another agency program) or self-declaration of income procedures to verify a client's income. Once the income has been verified, the agency must use the current HHS Poverty Guidelines for determining the client's eligibility for the CSBG services or benefits.

**Income Eligibility for Families with Foster Children or Youth that are Wards of the Court:**

The public funds for the child's or youth's support should not be used when verifying the family's income for CSBG funded services or benefits. Once the income has been verified, the agencies must use the current HHS Poverty Guidelines for determining the family's eligibility for the CSBG services or benefits.

**Poverty Line:**

Iowa's CSBG State Plan and Application (Section 12: Individual and Community Income Eligibility Requirements) establishes the poverty line for Iowa's CSBG program.

- 12.2. Income Eligibility for General/Short Term Services:** Describe how the state ensures eligible entities generally verify income eligibility for those services with limited in-take procedures (where individual income verification is not possible or practical). An example of these services is emergency food assistance.

The following policy is included in Iowa's CSBG policies and procedure manual:

Income Eligibility for General/Short Term Services:

For emergency and non-emergency general/short term CSBG funded services or benefits, Iowa community action agencies can use proxy income verification procedures (obtaining a client's income verification through another agency program) or self-declaration of income procedures to verify a client's income. Once the income has been verified, the agency must use the current U. S. Department of Health and Human Services (HHS) Poverty Guidelines for determining the client's eligibility for the agency's CSBG services or benefits.

As part of their CSBG Community Action Plan and Application, agencies are required to explain how their agency verifies client income and determines client eligibility for emergency and non-emergency general/short term agency CSBG funded services and benefits.

As part of the State CSBG Office CSBG program operations reviews, the State CSBG Office inspects a sample of the agency's emergency and non-emergency general/short term services client income verification and eligibility documentation from the last three years. The inspection confirms whether or not the agency is verifying client income and determining client eligibility as specified in their CSBG application, and is using Iowa's CSBG required income eligibility threshold as the ceiling for determining income eligibility for clients receiving agency CSBG funded emergency and non-emergency general/short term services or benefits.

- 12.3. Community-targeted Services:** Describe how the state ensure eligible entities' services target and benefit low-income communities for those services that provide a community-wide benefit (e.g., development of community assets/facilities, building partnerships with other organizations).

The following policy is included in Iowa's CSBG policies and procedure manual:

COMMUNITY-TARGETED SERVICES

Iowa community action agency CSBG supported community-targeted services must benefit low-income communities. The agency is responsible for having supporting information available for the State CSBG Office to inspect.

As part of their CSBG Community Action Plan and Application, agencies are required to explain how their agency ensures the community-targeted services their agency uses CSBG funds to support targets and benefits low-income communities.

As part of the State CSBG Office's CSBG program operations reviews, the State CSBG Office inspects the agency's community-targeted services documentation from the last three years to confirm the purpose of the services the agency supported with CSBG funds benefitted low-income communities.

**SECTION 13**  
**Results Oriented Management and Accountability (ROMA) System**

**13.1. Performance Management System:** Identify the performance measurement system that the state and all eligible entities use, as required by Section 678E(a) of the CSBG Act and the assurance under Section 676(b)(12) of the CSBG Act. **[Select one]**

☒ The Results Oriented Management and Accountability (ROMA) System

☐ Another performance management system that meets the requirements of Section 678E(b) of the CSBG Act

☐ An alternative system for measuring performance and results

**Note:** This response will also link to the corresponding assurance, item 14.12.

**13.1a. ROMA Description:** If ROMA was chosen in item 13.1, describe the state's written policies, procedures, or guidance documents on ROMA.

The model ROMA performance measurement system that the Office of Community Services facilitated the development of is the Community Action National Performance Indicators (NPIs). Iowa's CSBG Program adopted and uses the Community Action NPIs for community action data collection and reporting. The Community Action NPIs measure the impact Iowa's community action programs, services, and initiatives have on individuals, families, and communities, and measure progress towards achieving the three national Community Action goals:

1. Individuals and families with low incomes are stable and achieve economic security.
2. Communities where people with low incomes live are healthy and offer economic opportunity.
3. People with low incomes are engaged and active in building opportunities in communities.

Iowa's CSBG policies and procedures manual includes written policies, procedures, and Iowa community action agency participation requirements on implementing the ROMA performance measurement system. Also, Iowa's CSBG Community Action Plan and Application includes requirements for Community Action NPI collection and reporting.

Iowa's CSBG policies and procedures manual also includes ROMA concept policies. These policies require agencies to follow the ROMA cycle of assessment, planning, implementation, achievement of results, and evaluation for planning and administering their CSBG application and agency-wide strategic plan. This ensures that each agency's CSBG application and strategic plan will be outcome-based, anti-poverty focused, and tie directly to community needs assessments.

The State CSBG Office also includes ROMA participation requirements in the CSBG contracts it issues to the agencies.

**13.1b. Alternative System Description:** If an alternative system was chosen in item 13.1, describe the system the state will use for performance measurement.

N/A

- 13.2. Outcome Measures:** Indicate and describe the outcome measures the state will use to measure eligible entity performance in promoting self-sufficiency, family stability, and community revitalization, as required under Section 676(b)(12) of the CSBG Act. **[Select one]**

☒ CSBG National Performance Indicators (NPIs)

☐ NPIs and others

☐ Other, describe:

**Note:** This response will also link to the corresponding assurance, item 14.12.

- 13.3. Eligible Entity Support:** Describe how the state supports the eligible entities in using ROMA or an alternative performance measurement system.

Iowa law (2021 Iowa Acts, House File 895) addresses and provides the requirements for how Iowa's FFY 2022 and FFY 2023 CSBG allotments are to be distributed and allocated by the State CSBG Office. The Iowa law does not distribute or allocate CSBG funds to the State CSBG Office for remainder/discretionary activities.

Although the State CSBG Office does not receive CSBG funding for remainder/discretionary activities, the State CSBG Office still collaborates with and provides supports to Iowa's community action agencies in using the ROMA performance measurement system. The following is a list of the State CSBG Office's ROMA supports and activities:

- Iowa's CSBG Community Action Plan and Application: Iowa's CSBG application requires agencies to follow the ROMA cycle of assessment, planning, implementation, achievement of results, and evaluation for planning and administering their CSBG program. The CSBG application ensures that each agency's CSBG program will be outcome-based, anti-poverty focused, and tie directly to community needs assessments.
- ROMA Subgroup Meetings: The State CSBG Office Program Managers attend all of the agencies' ROMA Subgroup meetings. The subgroup meets at least five (5) times a year. The subgroup is made up of agency staff that have ROMA and CSBG roles and responsibilities at their agencies. The CSBG Program Managers are on all meeting agendas and provide federal and state CSBG and Community Action updates and information.
- Iowa Community Action Association (ICAA) Annual Conference: The State CSBG Office Program Managers are members of ICAA's conference planning committee. The State CSBG Office provides funding and resources for conference training needs, workshop speakers, and recognition awards. The conference offers ROMA training and information workshops.
- State Training and Technical Assistance (T&TA) Plan: The State CSBG Office Program Managers collaborate with ICAA on the planning and development of the state's comprehensive T&TA Plan. The T&TA Plan includes ROMA training opportunities for the agencies.
- Iowa Community Action Agency Trainings: The State CSBG Office Program Managers work with ICAA on identifying agency training needs and assisting ICAA on developing, organizing, and scheduling agency trainings. ICAA provides onsite, on-line, and on-demand ROMA training for agency staff and governing board members. The ICAA Training Director is a Master ROMA-Certified Trainer.
- Nationally Certified ROMA Trainer and Implementer Candidates: The State CSBG Office supports, and will continue to support, agency staff that plan to apply to the ROMA-Certified Trainer or ROMA-Certified Implementer training programs.
- Agency Client Tracking Systems: The State CSBG Office and ICAA work with the agencies' client tracking system vendors to ensure the systems track, collect, and report individual, family, and community level data, information, and outcomes.

- **Needs Assessment Committee:** The Needs Assessment Committee consists of seven members (the State CSBG Office Program Managers, the ICAA Training Director, and 4 agency CSBG staff). The committee is responsible for designing client and community surveys, developing instructions and guidance for administering the surveys, and creating statewide reports. Information from the reports can be used by the agencies for planning, developing, and prioritizing agency programs, services, and community initiatives.
- **State CSBG Office's Website:** The State CSBG Office's website includes a community assessment resources section. Agencies can access and use the information on the website for planning and developing a comprehensive community assessment.

**Note:** The activities described under item 13.3 may include activities listed in "Section 8: Training and Technical Assistance." If so, mention briefly, and/or cross-reference as needed. This response will also link to the corresponding assurance, item 14.12.

**13.4. Eligible Entity Use of Data:** Describe how the state intends to validate that the eligible entities are using data to improve service delivery.

Annually, Iowa's community action agencies are required to complete and submit a CSBG Community Action Plan and Application to the State CSBG Office. The CSBG application requires agencies to follow the ROMA cycle of assessment, planning, implementation, achievement of results, and evaluation for planning and administering their CSBG program. This ensures their agency's CSBG program will be outcome-based, anti-poverty focused, and tie directly to community needs assessments.

The CSBG application's evaluation section requires agencies to 1) report the final outcomes of their agency's individual and family programs and services, and community initiatives using the ROMA performance measurement system: Community Action NPIs, 2) review the final outcomes to determine the impact their agency's programs, services, and initiatives had on individuals, families, and communities, and 3) explain how they will use their final outcomes review to adjust their agency's individual and family programs and services, and community initiatives. The State CSBG Office reviews each agency's Community Action NPIs throughout the CSBG program year and provides feedback. The State CSBG Office also inspects and discusses the Community Action NPIs with the agency during their CSBG program operations review.

The State CSBG Office's CSBG organizational standards assessments include confirming that agencies are updating their governing board on the progress and outcomes in their CSBG application (CSBG Organizational Standard 4.4) and their agency's strategic plan goals (CSBG Organizational Standard 6.5). Also, the State CSBG Office reviews and confirms agency operational or strategic program adjustments and improvements to their CSBG application or their agency's strategic plan goals as a result of the agency's progress and outcomes reports (CSBG Organizational Standard 9.3)

Annually, agencies are required to provide information about changes they made to improve service delivery and enhance impact for individuals, families, and communities with low incomes based on their agency's review and analysis of performance data and information. The State CSBG Office reviews the information the agency provides. The State CSBG Office also discusses the information with the agency during their CSBG program operations review.

**Note:** This response will also link to the corresponding assurance, item 14.12.



## Community Action Plans and Needs Assessments

- 13.5. Community Action Plan:** Describe how the state will secure a Community Action Plan from each eligible entity, as a condition of receipt of CSBG funding by each entity, as required by Section 676(b)(11) of the CSBG Act.

Annually, Iowa's community action agencies are required to complete and submit an agency CSBG Community Action Plan and Application to the State CSBG Office. Agency CSBG application requirements and State CSBG Office application review and acceptance requirements are addressed in the Iowa Administrative Code (427-22.5 and 427-22.6), Iowa's CSBG policies and procedures manual, and in the CSBG application instructions. An agency's CSBG application must be accepted by the State CSBG Office before a CSBG contract will be issued to the agency.

No CSBG costs incurred are reimbursable until the agency receives a CSBG contract that is signed by the Administrator of the State CSBG Office.

**Note:** This response will link to the corresponding assurance, item 14.11.

- 13.6. Community Needs Assessment:** Describe how the state will assure that each eligible entity includes a community needs assessment for the community served (which may be coordinated with community needs assessments conducted by other programs) in each entity's Community Action Plan, as required by Section 676(b)(11) of the CSBG Act.

Annually, Iowa's community action agencies are required to complete and submit a CSBG Community Action Plan and Application to the State CSBG Office. The CSBG application instructions and forms require agencies to follow the ROMA cycle of assessment, planning, implementation, achievement of results, and evaluation for planning and administering their CSBG program. This ensures their agency's CSBG program will be outcome-based, anti-poverty focused, and tie directly to community needs assessments.

The CSBG application's assessment section requires agencies to use their community needs assessment report when planning and determining the individual and family programs and services their agency will implement, and the community initiatives their agency will implement and be involved in during the CSBG program year.

Agencies must include a copy of their community needs assessment report, or the executive summary from the report, with their CSBG application.

**Note:** This response will link to the corresponding assurance, item 14.11.

**SECTION 14**  
**CSBG Programmatic Assurances and Information Narrative**  
**(Section 676(b) of the CSBG Act)**

**14.1 Use of Funds Supporting Local Activities**

***CSBG Services***

- 14.1a. 676(b)(1)(A):** Describe how the state will assure “that funds made available through grant or allotment will be used –
- (A) to support activities that are designed to assist low-income families and individuals, including families and individuals receiving assistance under title IV of the Social Security Act, homeless families and individuals, migrant or seasonal farmworkers, and elderly low-income individuals and families, and a description of how such activities will enable the families and individuals--
    - (i) to remove obstacles and solve problems that block the achievement of self-sufficiency (particularly for families and individuals who are attempting to transition off a State program carried out under part A of title IV of the Social Security Act);
    - (ii) to secure and retain meaningful employment;
    - (iii) to attain an adequate education with particular attention toward improving literacy skills of the low-income families in the community, which may include family literacy initiatives;
    - (iv) to make better use of available income;
    - (v) to obtain and maintain adequate housing and a suitable living environment;
    - (vi) to obtain emergency assistance through loans, grants, or other means to meet immediate and urgent individual and family needs;
    - (vii) to achieve greater participation in the affairs of the communities involved, including the development of public and private grassroots partnerships with local law enforcement agencies, local housing authorities, private foundations, and other public and private partners to –
      - (I) document best practices based on successful grassroots intervention in urban areas, to develop methodologies for widespread replication; and
      - (II) strengthen and improve relationships with local law enforcement agencies, which may include participation in activities such as neighborhood or community policing efforts;

To ensure that all of Iowa's community action agencies use their CSBG funds for programs, services, and initiatives that are consistent with the requirements of the CSBG Act, the State CSBG Office has established CSBG application requirements, contractual requirements, policies and procedures, program guidance, detailed programs and services reporting processes, outcomes reporting processes, detailed financial reporting processes, certification and assurance requirements, and program operations and fiscal monitoring reviews.

As part of their CSBG Community Action Plan and Application, agencies are required to explain how their agency will assure their CSBG funds and/or CSBG funded resources (i.e. office space, equipment, supplies, staff time) are used to support activities to assist low-income individuals and families to achieve self-sufficiency, secure/retain employment, attain education, make better use of available income, obtain/maintain housing, obtain emergency assistance, and participate in community affairs. Agencies are also required to sign a certification statement acknowledging that their agency understands and agrees to this CSBG assurance.

## ***Needs of Youth***

- 14.1b. 676(b)(1)(B)** Describe how the state will assure “that funds made available through grant or allotment will be used –
- (B) to address the needs of youth in low-income communities through youth development programs that support the primary role of the family, give priority to the prevention of youth problems and crime, and promote increased community coordination and collaboration in meeting the needs of youth, and support development and expansion of innovative community-based youth development programs that have demonstrated success in preventing or reducing youth crime, such as--
    - (i) programs for the establishment of violence-free zones that would involve youth development and intervention models (such as models involving youth mediation, youth mentoring, life skills training, job creation, and entrepreneurship programs); and
    - (ii) after-school child care programs;

Iowa's community action agencies, as part of their CSBG Community Action Plan and Application, are required to explain how their agency will assure their CSBG funds and/or CSBG funded resources (i.e. office space, equipment, supplies, staff time) are used to address youth needs through youth development programs, and programs and services with youth components. Agencies are also required to sign a certification statement acknowledging that their agency understands and agrees to this CSBG assurance.

All agencies support, collaborate, and make client referrals to youth programs in their communities. Some of the youth programs and services agencies are involved with include: teen pregnancy education, youth employment, mentoring, after school programs, job training, park and recreation activities, education and reading programs, education scholarships, anti-bullying programs, drug and alcohol programs, abstinence education, suicide prevention, and volunteering.

A number of agencies administer programs that include youth components, such as, the Family Development and Self-Sufficiency program; Women, Infants, and Children (WIC); and Stork's Nest. These programs provide health, nutrition, counseling, education, and/or protection services for youth and teenaged parents.

## ***Coordination of Other Programs***

- 14.1c. 676(b)(1)(C)** Describe how the state will assure “that funds made available through grant or allotment will be used –
- (C) to make more effective use of, and to coordinate with, other programs related to the purposes of this subtitle (including state welfare reform efforts)

Iowa's community action agencies, as part of their CSBG Community Action Plan and Application, are required to explain how their agency will assure their CSBG funds and/or CSBG funded resources (i.e. office space, equipment, supplies, staff time) are used to support or coordinate with other programs and services that are designed to assist low-income individuals and families. Agencies are also required to sign a certification statement acknowledging that their agency understands and agrees to this CSBG assurance.

All agencies refer their clients to other public and private anti-poverty organizations that provide programs and services for low-income Iowans. These referrals expand the resources and assistance opportunities for the clients and their families.

The State CSBG Office's CSBG program operations reviews and CSBG organizational standards assessments include a review of the agency's partnerships with public and private anti-poverty organizations.

## State Use of Discretionary Funds

- 14.2 676(b)(2)** Describe “how the state intends to use discretionary funds made available from the remainder of the grant or allotment described in Section 675C(b) of the CSBG Act in accordance with this subtitle, including a description of how the state will support innovative community and neighborhood-based initiatives related to the purposes of this subtitle.”

**[No response; links to items 7.9 and 7.10.]**

**Note:** The state describes this assurance under “State Use of Funds: Remainder/Discretionary,” items 7.9 and 7.10.

## Eligible Entity Service Delivery, Coordination, and Innovation

- 14.3. 676(b)(3)** “Based on information provided by eligible entities in the State, a description of...”

### *Eligible Entity Service Delivery System*

- 14.3a. 676(b)(3)(A)** Describe “the service delivery system, for services provided or coordinated with funds made available through grants made under Section 675C(a) of the CSBG Act, targeted to low-income individuals and families in communities within the State;

Annually, ninety-six percent (96%) of Iowa’s CSBG allotment is distributed to Iowa’s community action agencies. All 99 counties in Iowa will receive CSBG funded programs and services through these agencies. The agencies are required to use their CSBG allocation for efforts to reduce poverty, revitalize low-income communities, and empower low-income individuals and families.

Agencies, as part of their CSBG Community Action Plan and Application, are required to describe their agency’s service delivery system. The description must include: their agency’s service delivery system for providing programs and services to low-income individuals and families; information about their agency’s service area, office locations, accessibility, and intake processes; how their agency will provide or coordinate services for low-income individuals and families that need services and assistance during their agency’s non-business hours; how their agency will provide or coordinate services for low-income individuals and families that are unable to come to their offices for services or assistance (e.g., home visits, phone calls); and how their agency will provide or coordinate services for low-income individuals with disabilities or special needs (e.g., a physical disability, deafness, blindness, limited English proficiency, low literacy).

All agencies have outreach site office systems in place for serving individuals and families. The outreach staff are trained to provide case management and assessment services. These services ensure that the individuals and families will be enrolled and/or referred to appropriate assistance programs and services. Outreach staff also provide follow-up case management and assessment services as needed.

For individuals that are homebound or are unable to visit an agency for programs and services, agencies provide assistance by phone, mail, electronic communications, and/or home visits. Some agencies have special outreach services hours in the mornings or evenings to serve working individuals and those who are unable to visit the agency during normal business hours.

### ***Eligible Entity Linkages – Approach to Filling Service Gaps***

- 14.3b. 676(b)(3)(B)** Describe “how linkages will be developed to fill identified gaps in the services, through the provision of information, referrals, case management, and follow up consultations.”

**[No response; links to 9.3b]**

**Note:** The state describes this assurance in the State Linkages and Communication section, item 9.3b.

### ***Coordination of Eligible Entity Allocation 90 Percent Funds with Public/Private Resources***

- 14.3c. 676(b)(3)(C)** Describe how funds made available through grants made under Section 675C(a) of the CSBG Act will be coordinated with other public and private resources.”

**[No response; links to 9.7]**

**Note:** The state describes this assurance in the State Linkages and Communication section, item 9.7.

### ***Eligible Entity Innovative Community and Neighborhood Initiatives, Including Fatherhood/Parental Responsibility***

- 14.3d. 676(b)(3)(D)** Describe “how the local entity will use the funds [made available under Section 675C(a) of the CSBG Act] to support innovative community and neighborhood-based initiatives related to the purposes of this subtitle, which may include fatherhood initiatives and other initiatives with the goal of strengthening families and encouraging parenting.”

Iowa's community action agencies, as part of their CSBG Community Action Plan and Application, are required to describe how their agency will use their CSBG funds or CSBG funded resources (i.e. office space, equipment, supplies, staff time) to support community and neighborhood initiatives that are designed to revitalize low-income communities, and to support fatherhood initiatives and initiatives that have goals of strengthening families and encouraging parental responsibility.

All agencies use their CSBG funds or CSBG funded resources to support community and neighborhood initiatives and strategies. Some of the community initiatives and strategies agencies are involved with include: health clinics, dental clinics, mental health centers, substance abuse programs, immigration services, flood recovery, low-income housing projects, neighborhood clean-ups, after school care programs, community centers, and building renovations.

Agencies also use their CSBG funds or CSBG funded resources to support a number of family and effective parenting initiatives. These initiatives are mostly components of the programs and services they administer, such as, the Family Development and Self-Sufficiency program; Head Start and Early Head Start programs; Women, Infants, and Children (WIC); Maternal Health; and Child Health. The fatherhood initiatives included in these programs and services encourage fathers to participate in meetings, activities, and literacy events that focus on family relationships and parenting skills.

All agencies report supporting, collaborating, and partnering with programs and services in their communities that focus on strengthening families and encouraging effective parenting.

**Note:** The description above is about eligible entity use of 90 percent funds to support these initiatives. States may also support these types of activities at the local level using state remainder/discretionary funds, allowable under Section 675C(b)(1)(F) of the CSBG Act. In this State Plan, the state indicates funds allocated for these activities under item 7.9(f).

## Eligible Entity Emergency Food and Nutrition Services

- 14.4. 676(b)(4)** Describe how the state will assure “that eligible entities in the State will provide, on an emergency basis, for the provision of such supplies and services, nutritious foods, and related services, as may be necessary to counteract conditions of starvation and malnutrition among low-income individuals.”

Iowa's community action agencies, as part of their CSBG Community Action Plan and Application, are required to explain how their agency will assure food will be provided in emergency situations to low-income individuals and families that are seeking immediate food assistance. Agencies are also required to sign a certification statement acknowledging that their agency understands and agrees to this CSBG assurance.

All agencies operate their own food pantries and/or partner with existing pantries in their service area, and provide food or food vouchers for emergency purposes. In most emergency situations, agencies provide households with a 3 to 7 day supply of nutritious food. Households with transportation problems are referred to other food providers or delivered a food package. Once a household's emergency food needs are met, agencies will assess and provide case management services to the household and enroll them or refer them to appropriate food assistance and other necessary programs and services.

Agencies also administer a number of programs and services that address the conditions of starvation and malnutrition. Programs and services, such as, the Child and Adult Care Food Program; Women, Infants, and Children (WIC); farmers' markets; holiday food projects and baskets; garden and canning programs; surplus foods; nutritional counseling and education services; and congregate and senior meals.

Fourteen agencies administer the Head Start and/or the Early Head Start programs. Children participating in these programs receive nutritious meals during the day.

Since FFY 2005, the agencies have partnered with the Iowa Department of Human Services to provide outreach and enrollment support for Iowa's Food Assistance program (SNAP). This effort has assisted in leveraging thousands of dollars in additional Food Assistance program funds for Iowa's low-income individuals and families.

## State and Eligible Entity Coordination/linkages and Workforce Innovation and Opportunity Act Employment and Training Activities

- 14.5. 676(b)(5)** Describe how the state will assure “that the state and eligible entities in the State will coordinate, and establish linkages between, governmental and other social services programs to assure the effective delivery of such services, and [describe] how the state and the eligible entities will coordinate the provision of employment and training activities, as defined in Section 3 of the Workforce Innovation and Opportunity Act, in the State and in communities with entities providing activities through statewide and local workforce development systems under such Act.”

**[No response; links to items 9.1, 9.2, 9.3a, 9.4, 9.4a, and 9.4b]**

**Note:** The state describes this assurance in the State Linkages and Communication section, items 9.1, 9.2, 9.3a, 9.4, 9.4a, and 9.4b.

## State Coordination/Linkages and Low-income Home Energy Assistance

- 14.6. 676(b)(6)** Provide “an assurance that the state will ensure coordination between antipoverty programs in each community in the State, and ensure, where appropriate, that emergency energy crisis intervention programs under title XXVI (relating to low-income home energy assistance) are conducted in such community.”

**[No response; links to 9.2 and 9.5]**

**Note:** The state describes this assurance in the State Linkages and Communication section, items 9.2 and 9.5.

## **Federal Investigations**

- 14.7. 676(b)(7)** Provide “an assurance that the state will permit and cooperate with federal investigations undertaken in accordance with Section 678D of the CSBG Act.”

**[No response; links to 10.13]**

**Note:** The state addresses this assurance in the Fiscal Controls and Monitoring section, item 10.13.

## **Funding Reduction or Termination**

- 14.8. 676(b)(8)** Provide “an assurance that any eligible entity in the State that received funding in the previous fiscal year through a community services block grant made under this subtitle will not have its funding terminated under this subtitle, or reduced below the proportional share of funding the entity received in the previous fiscal year unless, after providing notice and an opportunity for a hearing on the record, the state determines that cause exists for such termination or such reduction, subject to review by the Secretary as provided in Section 678C(b) of the CSBG Act.”

**[No response; links to 10.7]**

**Note:** The state addresses this assurance in the Fiscal Controls and Monitoring section, item 10.7.

## **Coordination with Faith-based Organizations, Charitable Groups, Community Organizations**

- 14.9. 676(b)(9)** Describe how the state will assure “that the state and eligible entities in the State will, to the maximum extent possible, coordinate programs with and form partnerships with other organizations serving low-income residents of the communities and members of the groups served by the state, including religious organizations, charitable groups, and community organizations.”

**[No response; links to 9.6]**

**Note:** The state describes this assurance in the State Linkages and Communication section, item 9.6.

## **Eligible Entity Tripartite Board Representation**

- 14.10. 676(b)(10)** Describe how “the state will require each eligible entity in the State to establish procedures under which a low-income individual, community organization, or religious organization, or representative of low-income individuals that considers its organization, or low-income individuals, to be inadequately represented on the board (or other mechanism) of the eligible entity to petition for adequate representation.”

**[No response; links to item 11.3]**

**Note:** The state describes this assurance in the Eligible Entity Tripartite Board section, item 11.3.

## Eligible Entity Community Action Plans and Community Needs Assessments

- 14.11. 676(b)(11)** Provide “an assurance that the state will secure from each eligible entity in the State, as a condition to receipt of funding by the entity through a community services block grant made under this subtitle for a program, a community action plan (which shall be submitted to the Secretary, at the request of the Secretary, with the State Plan) that includes a community-needs assessment for the community served, which may be coordinated with community-needs assessments conducted for other programs.”

**[No response; links to items 13.5 and 13.6]**

**Note:** The state describes this assurance in the ROMA section, items 13.5 and 13.6.

## State and Eligible Entity Performance Measurement: ROMA or Alternate system

- 14.12. 676(b)(12)** Provide “an assurance that the state and all eligible entities in the State will, not later than fiscal year 2001, participate in the Results Oriented Management and Accountability System, another performance measure system for which the Secretary facilitated development pursuant to Section 678E(b) of the CSBG Act, or an alternative system for measuring performance and results that meets the requirements of that section, and [describe] outcome measures to be used to measure eligible entity performance in promoting self-sufficiency, family stability, and community revitalization.”

**[No response; links to 13.1, 13.2, 13.3, and 13.4]**

**Note:** The state describes this assurance in the ROMA section, items 13.1, 13.2, 13.3, and 13.4.

## Validation for CSBG Eligible Entity Programmatic Narrative Sections

- 14.13. 676(b)(13)** Provide “information describing how the state will carry out the assurances described in this section.”

**[No response for this item]**

**Note:** The state provides information for each of the assurances directly in Section 14 or in corresponding items throughout the State Plan, which are included as hyperlinks in Section 14.

- By checking this box, the state CSBG authorized official is certifying the assurances set out above.



**SECTION 15**  
**Federal Certifications**

**The box after each certification must be checked by the state CSBG authorized official.**

**15.1 Lobbying**

Certification for Contracts, Grants, Loans, and Cooperative Agreements

The undersigned certifies, to the best of his or her knowledge and belief, that:

- (1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.
- (2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions.
- (3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by Section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Statement for Loan Guarantees and Loan Insurance

The undersigned states, to the best of his or her knowledge and belief, that:

If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions.

Submission of this statement is a prerequisite for making or entering into this transaction imposed by Section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

- By checking this box, the state CSBG authorized official is providing the certification set out above.

## 15.2 Drug-Free Workplace Requirements

This certification is required by the regulations implementing the Drug-Free Workplace Act of 1988: 45 CFR Part 76, Subpart, F. Sections 76.630(c) and (d)(2) and 76.645 (a)(1) and (b) provide that a Federal agency may designate a central receipt point for STATE-WIDE AND STATE AGENCY-WIDE certifications, and for notification of criminal drug convictions. For the Department of Health and Human Services, the central point is: Division of Grants Management and Oversight, Office of Management and Acquisition, Department of Health and Human Services, Room 517-D, 200 Independence Avenue, SW Washington, DC 20201.

### Certification Regarding Drug-Free Workplace Requirements (Instructions for Certification)

- (1) By signing and/or submitting this application or grant agreement, the grantee is providing the certification set out below.
- (2) The certification set out below is a material representation of fact upon which reliance is placed when the agency awards the grant. If it is later determined that the grantee knowingly rendered a false certification, or otherwise violates the requirements of the Drug-Free Workplace Act, the agency, in addition to any other remedies available to the Federal Government, may take action authorized under the Drug-Free Workplace Act.
- (3) For grantees other than individuals, Alternate I applies.
- (4) For grantees who are individuals, Alternate II applies.
- (5) Workplaces under grants, for grantees other than individuals, need to be identified on the certification. If known, they may be identified in the grant application. If the grantee does not identify the workplaces at the time of application, or upon award, if there is no application, the grantee must keep the identity of the workplace(s) on file in its office and make the information available for Federal inspection. Failure to identify all known workplaces constitutes a violation of the grantee's drug-free workplace requirements.
- (6) Workplace identifications must include the actual address of buildings (or parts of buildings) or other sites where work under the grant takes place. Categorical descriptions may be used (e.g., all vehicles of a mass transit authority or State highway department while in operation, State employees in each local unemployment office, performers in concert halls or radio studios).
- (7) If the workplace identified to the agency changes during the performance of the grant, the grantee shall inform the agency of the change(s), if it previously identified the workplaces in question (see paragraph five).
- (8) Definitions of terms in the Nonprocurement Suspension and Debarment common rule and Drug-Free Workplace common rule apply to this certification. Grantees' attention is called, in particular, to the following definitions from these rules:

Controlled substance means a controlled substance in Schedules I through V of the Controlled Substances Act (21 U.S.C. 812) and as further defined by regulation (21 CFR 1308.11 through 1308.15);

Conviction means a finding of guilt (including a plea of nolo contendere) or imposition of sentence, or both, by any judicial body charged with the responsibility to determine violations of the Federal or State criminal drug statutes;

Criminal drug statute means a Federal or non-Federal criminal statute involving the manufacture, distribution, dispensing, use, or possession of any controlled substance;

Employee means the employee of a grantee directly engaged in the performance of work under a grant, including: (i) All direct charge employees; (ii) All indirect charge employees unless their impact or involvement is insignificant to the performance of the grant; and, (iii) Temporary personnel and consultants who are directly engaged in the performance of work under the grant and who are on the grantee's payroll. This definition does not include workers not on the payroll of the grantee (e.g., volunteers, even if used to meet a matching requirement; consultants or independent contractors not on the grantee's payroll; or employees of subrecipients or subcontractors in covered workplaces).

Certification Regarding Drug-Free Workplace Requirements

Alternate I. (Grantees Other Than Individuals)

The grantee certifies that it will or will continue to provide a drug-free workplace by:

- (a) Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;
- (b) Establishing an ongoing drug-free awareness program to inform employees about - -
  - (1) The dangers of drug abuse in the workplace;
  - (2) The grantee's policy of maintaining a drug-free workplace;
  - (3) Any available drug counseling, rehabilitation, and employee assistance programs; and
  - (4) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;
- (c) Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph (a);
- (d) Notifying the employee in the statement required by paragraph (a) that, as a condition of employment under the grant, the employee will - -
  - (1) Abide by the terms of the statement; and
  - (2) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;
- (e) Notifying the agency in writing, within 10 calendar days after receiving notice under paragraph (d)(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;
- (f) Taking one of the following actions, within 30 calendar days of receiving notice under paragraph (d)(2), with respect to any employee who is so convicted - -
  - (1) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
  - (2) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;
- (g) Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs (a), (b), (c), (d), (e) and (f).

The grantee may insert in the space provided below the site(s) for the performance of work done in connection with the specific grant:

Place of Performance (Street address, city, county, state, zip code)

**321 East 12th Street  
Lucas State Office Building – 2nd Floor  
Des Moines, Iowa 50319  
(Polk County)**

■ Check if there are workplaces on file that are not identified here.

Alternate II. (Grantees Who Are Individuals)

- (a) The grantee certifies that, as a condition of the grant, he or she will not engage in the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance in conducting any activity with the grant;
- (b) If convicted of a criminal drug offense resulting from a violation occurring during the conduct of any grant activity, he or she will report the conviction, in writing, within 10 calendar days of the conviction, to every grant officer or other designee, unless the Federal agency designates a central point for the receipt of such notices. When notice is made to such a central point, it shall include the identification number(s) of each affected grant.

- By checking this box, the state CSBG authorized official is providing the certification set out above.

### 15.3 Debarment

#### Certification Regarding Debarment, Suspension, and Other Responsibility Matters - - Primary Covered Transactions

##### Instructions for Certification

- (1) By signing and submitting this proposal, the prospective primary participant is providing the certification set out below.
- (2) The inability of a person to provide the certification required below will not necessarily result in denial of participation in this covered transaction. The prospective participant shall submit an explanation of why it cannot provide the certification set out below. The certification or explanation will be considered in connection with the department or agency's determination whether to enter into this transaction. However, failure of the prospective primary participant to furnish a certification or an explanation shall disqualify such person from participation in this transaction.
- (3) The certification in this clause is a material representation of fact upon which reliance was placed when the department or agency determined to enter into this transaction. If it is later determined that the prospective primary participant knowingly rendered an erroneous certification, in addition to other remedies available to the Federal Government, the department or agency may terminate this transaction for cause or default.
- (4) The prospective primary participant shall provide immediate written notice to the department or agency to which this proposal is submitted if at any time the prospective primary participant learns that its certification was erroneous when submitted or has become erroneous by reason of changed circumstances.
- (5) The terms covered transaction, debarred, suspended, ineligible, lower tier covered transaction, participant, person, primary covered transaction, principal, proposal, and voluntarily excluded, as used in this clause, have the meanings set out in the Definitions and Coverage sections of the rules implementing Executive Order 12549. You may contact the department or agency to which this proposal is being submitted for assistance in obtaining a copy of those regulations.
- (6) The prospective primary participant agrees by submitting this proposal that, should the proposed covered transaction be entered into, it shall not knowingly enter into any lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, declared ineligible, or voluntarily excluded from participation in this covered transaction, unless authorized by the department or agency entering into this transaction.
- (7) The prospective primary participant further agrees by submitting this proposal that it will include the clause titled "Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusive-Lower Tier Covered Transaction," provided by the department or agency entering into this covered transaction, without modification, in all lower tier covered transactions and in all solicitations for lower tier covered transactions.
- (8) A participant in a covered transaction may rely upon a certification of a prospective participant in a lower tier covered transaction that is not proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, ineligible, or voluntarily excluded from the covered transaction, unless it knows that the certification is erroneous. A participant may decide the method and frequency by which it determines the eligibility of its principals. Each participant may, but is not required to, check the List of Parties Excluded from Federal Procurement and Nonprocurement Programs.
- (9) Nothing contained in the foregoing shall be construed to require establishment of a system of records in order to render in good faith the certification required by this clause. The knowledge and information of a participant is not required to exceed that which is normally possessed by a prudent person in the ordinary course of business dealings.

- (10) Except for transactions authorized under paragraph 6 of these instructions, if a participant in a covered transaction knowingly enters into a lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, suspended, debarred, ineligible, or voluntarily excluded from participation in this transaction, in addition to other remedies available to the Federal Government, the department or agency may terminate this transaction for cause or default.

Certification Regarding Debarment, Suspension, and Other Responsibility Matters - -  
Primary Covered Transactions

- (1) The prospective primary participant certifies to the best of its knowledge and belief, that it and its principals:
- (a) Are not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded by any Federal department or agency;
  - (b) Have not within a three-year period preceding this proposal been convicted of or had a civil judgment rendered against them for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public (Federal, State or local) transaction or contract under a public transaction; violation of Federal or State antitrust statutes or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, or receiving stolen property;
  - (c) Are not presently indicted for or otherwise criminally or civilly charged by a governmental entity (Federal, State or local) with commission of any of the offenses enumerated in paragraph (1)(b) of this certification; and
  - (d) Have not within a three-year period preceding this application/proposal had one or more public transactions (Federal, State or local) terminated for cause or default.
- (2) Where the prospective primary participant is unable to certify to any of the statements in this certification, such prospective participant shall attach an explanation to this proposal.

Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion - -  
Lower Tier Covered Transactions

Instructions for Certification

- (1) By signing and submitting this proposal, the prospective lower tier participant is providing the certification set out below.
- (2) The certification in this clause is a material representation of fact upon which reliance was placed when this transaction was entered into. If it is later determined that the prospective lower tier participant knowingly rendered an erroneous certification, in addition to other remedies available to the Federal Government the department or agency with which this transaction originated may pursue available remedies, including suspension and/or debarment.
- (3) The prospective lower tier participant shall provide immediate written notice to the person to which this proposal is submitted if at any time the prospective lower tier participant learns that its certification was erroneous when submitted or had become erroneous by reason of changed circumstances.
- (4) The terms covered transaction, debarred, suspended, ineligible, lower tier covered transaction, participant, person, primary covered transaction, principal, proposal, and voluntarily excluded, as used in this clause, have the meaning set out in the Definitions and Coverage sections of rules implementing Executive Order 12549. You may contact the person to which this proposal is submitted for assistance in obtaining a copy of those regulations.

- (5) The prospective lower tier participant agrees by submitting this proposal that, should the proposed covered transaction be entered into, it shall not knowingly enter into any lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, declared ineligible, or voluntarily excluded from participation in this covered transaction, unless authorized by the department or agency with which this transaction originated.
- (6) The prospective lower tier participant further agrees by submitting this proposal that it will include this clause titled "Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion-Lower Tier Covered Transaction," without modification, in all lower tier covered transactions and in all solicitations for lower tier covered transactions.
- (7) A participant in a covered transaction may rely upon a certification of a prospective participant in a lower tier covered transaction that it is not proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, ineligible, or voluntarily excluded from covered transactions, unless it knows that the certification is erroneous. A participant may decide the method and frequency by which it determines the eligibility of its principals. Each participant may, but is not required to, check the List of Parties Excluded from Federal Procurement and Nonprocurement Programs.
- (8) Nothing contained in the foregoing shall be construed to require establishment of a system of records in order to render in good faith the certification required by this clause. The knowledge and information of a participant is not required to exceed that which is normally possessed by a prudent person in the ordinary course of business dealings.
- (9) Except for transactions authorized under paragraph five of these instructions, if a participant in a covered transaction knowingly enters into a lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, suspended, debarred, ineligible, or voluntarily excluded from participation in this transaction, in addition to other remedies available to the Federal Government, the department or agency with which this transaction originated may pursue available remedies, including suspension and/or debarment.

Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion --  
Lower Tier Covered Transactions

- (1) The prospective lower tier participant certifies, by submission of this proposal, that neither it nor its principals is presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from participation in this transaction by any Federal department or agency.
- (2) Where the prospective lower tier participant is unable to certify to any of the statements in this certification, such prospective participant shall attach an explanation to this proposal.

■ By checking this box, the state CSBG authorized official is providing the certification set out above.

#### **15.4 Environmental Tobacco Smoke**

Public Law 103227, Part C Environmental Tobacco Smoke, also known as the Pro Children Act of 1994, requires that smoking not be permitted in any portion of any indoor routinely owned or leased or contracted for by an entity and used routinely or regularly for provision of health, day care, education, or library services to children under the age of 18, if the services are funded by Federal programs either directly or through State or local governments, by Federal grant, contract, loan, or loan guarantee. The law does not apply to children's services provided in private residences, facilities funded solely by Medicare or Medicaid funds, and portions of facilities used for inpatient drug or alcohol treatment. Failure to comply with the provisions of the law may result in the imposition of a civil monetary penalty of up to \$1000 per day and/or the imposition of an administrative compliance order on the responsible entity by signing and submitting this application the applicant/grantee certifies that it will comply with the requirements of the Act.

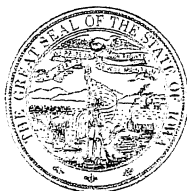
The applicant/grantee further agrees that it will require the language of this certification be included in any subawards which contain provisions for the children's services and that all subgrantees shall certify accordingly.

- By checking this box, the state CSBG authorized official is providing the certification set out above.



## **ATTACHMENTS**

- A Designation Letter
- B 2021 Iowa Code (state legislation)
- C 2021 Iowa Acts, House File 895 (state legislation)
- D Iowa Administrative Code (state regulations)
- E Notice of public inspection and public hearing news release
- F State Plan distribution communications
- G Notice of public inspection and public hearing announcement
- H Legislative hearing documentation
- I CSBG Eligible Entities
- J Planned Allocation (FFY 2022)
- K Monitoring of CSBG Eligible Entities
- L Monitoring Policies
  - Iowa CSBG Policies and Procedures Manual (7-2-2018):
    - CSBG Program Reviews (pages 25-33)
    - Fiscal Monitoring (page 34)



KIM REYNOLDS  
GOVERNOR

**OFFICE OF THE GOVERNOR**

ADAM GREGG  
LT GOVERNOR

August 20, 2019

Mr. Clarence Carter, Acting Director  
Office of Community Services  
Administration for Children and Families  
U.S. Department of Health and Human Services  
330 C Street SW  
Washington, D.C. 20201

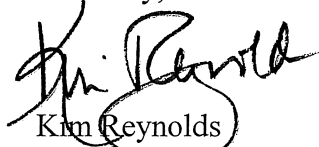
RE: Designation of Lead State Agency to Administer the CSBG Program

Dear Mr. Carter,

I, Governor Kim Reynolds, in accordance with Section 216A.92 of the Iowa Code, designate the Iowa Department of Human Rights, Division of Community Action Agencies, to act as the lead agency for the administration of the Community Services Block Grant.

The Administrator of the Division of Community Action Agencies will serve as the State CSBG Official and CSBG Program Contact Person.

Sincerely,

  
Kim Reynolds  
Governor of Iowa

**RECEIVED**

AUG 26 2019

DHRDCAA

## 2021 IOWA CODE, CHAPTER 216A

SUBCHAPTER 6  
DIVISION OF COMMUNITY ACTION AGENCIES**216A.91 Definitions.**

For purposes of this subchapter, unless the context otherwise requires:

1. *"Administrator"* means the administrator of the division of community action agencies of the department of human rights.
2. *"Commission"* means the commission on community action agencies.
3. *"Community action agency"* means a public agency or a private nonprofit agency which is authorized under its charter or bylaws to receive funds to administer community action programs and is designated by the governor to receive and administer the funds.
4. *"Community action program"* means a program conducted by a community action agency which includes projects to provide a range of services to improve the conditions of poverty in the area served by the community action agency.
5. *"Delegate agency"* means a subgrantee or contractor selected by the community action agency.
6. *"Division"* means the division of community action agencies of the department of human rights.

86 Acts, ch 1245, §1240

C87, §601K.91

90 Acts, ch 1242, §1

C93, §216A.91

Referred to in §23A.2, §256I.8

**216A.92 Division of community action agencies.**

1. The division of community action agencies is established. The purpose of the division of community action agencies is to strengthen, supplement, and coordinate efforts to develop the full potential of each citizen by recognizing certain community action agencies and supporting certain community-based programs delivered by community action agencies.
2. The division shall do all of the following:
  - a. Provide financial assistance for community action agencies to implement community action programs, as permitted by the community service block grant and subject to the funding made available for the program.
  - b. Administer the community services block grant, the low-income energy assistance block grants, department of energy funds for weatherization, and other possible funding sources. If a political subdivision is the community action agency, the financial assistance shall be allocated to the political subdivision.
  - c. Implement accountability measures for its programs and require regular reporting on the measures by the community action agencies.
  - d. Issue an annual report to the governor and general assembly by July 1 of each year.

86 Acts, ch 1245, §1241

C87, §601K.92

90 Acts, ch 1242, §2

C93, §216A.92

2010 Acts, ch 1031, §122, 170

**216A.92A Commission established.**

1. The commission on community action agencies is created, composed of nine members appointed by the governor, subject to confirmation by the senate. The membership of the commission shall reflect the composition of local community action agency boards as follows:

- a. One-third of the members shall be elected officials.
  - b. One-third of the members shall be representatives of business, industry, labor, religious, welfare, and educational organizations, or other major interest groups.
  - c. One-third of the members shall be persons who, according to federal guidelines, have incomes at or below one hundred eighty-five percent of poverty level.
2. Commission members shall serve three-year terms which shall begin and end pursuant to section 69.19, and shall serve the entire term even if the member experiences a change in the status which resulted in their appointment under subsection 1. Vacancies on the commission shall be filled for the remainder of the term of the original appointment. Members whose terms expire may be reappointed. Members of the commission shall receive actual expenses for their services. Members may also be eligible to receive compensation as provided in section 7E.6. Members as specified under subsection 1, paragraph "c", however, shall receive per diem compensation as provided in section 7E.6 and actual expenses. The membership of the commission shall also comply with the political party affiliation and gender balance requirements of sections 69.16 and 69.16A.
3. The commission shall select from its membership a chairperson and other officers as it deems necessary. The commission shall meet no less than four times per year. A majority of the members of the commission shall constitute a quorum.

90 Acts, ch 1242, §3

C91, §601K.92A

92 Acts, ch 1237, §13

C93, §216A.92A

99 Acts, ch 201, §13; 2010 Acts, ch 1031, §123, 124, 170

Referred to in §541A.5

Confirmation, see §2.32

#### **216A.92B Commission powers and duties.**

The commission shall have the following powers and duties:

- 1. Recommend to the board the adoption of rules pursuant to chapter 17A as it deems necessary for the commission and division.
- 2. Supervise the collection of data regarding the scope of services provided by the community action agencies.
- 3. Serve as liaisons between the division and the public, sharing information and gathering constituency input.
- 4. Make recommendations to the governor and the general assembly for executive and legislative action designed to improve the status of low-income persons in the state.
- 5. Establish advisory committees, work groups, or other coalitions as appropriate.

90 Acts, ch 1242, §4

C91, §601K.92B

C93, §216A.92B

2010 Acts, ch 1031, §125, 170

#### **216A.93 Establishment of community action agencies.**

The division shall recognize and assist in the designation of certain community action agencies to assist in the delivery of community action programs. These programs shall include but not be limited to outreach, community services block grant, low-income energy assistance, and weatherization programs. If a community action agency is in effect and currently serving an area, that community action agency shall become the designated community action agency for that area. If any geographic area of the state ceases to be served by a designated community action agency, the division may solicit applications and assist the governor in designating a community action agency for that area in accordance with current community services block grant requirements.

86 Acts, ch 1245, §1242  
 C87, §601K.93  
 C93, §216A.93  
 2010 Acts, ch 1031, §126, 170  
 Referred to in §423.3

**216A.94 Community action agency board.**

1. A recognized community action agency shall be governed by a board of directors composed of at least nine members. The board membership shall be as follows:
  - a. One-third of the members of the board shall be elected public officials currently holding office or their representatives. However, if the number of elected officials available and willing to serve is less than one-third of the membership of the board, the membership of the board consisting of appointive public officials may be counted as fulfilling the requirement that one-third of the members of the board be elected public officials.
  - b. At least one-third of the members of the board shall be chosen in accordance with procedures established by the community action agency to assure representation of the poor in an area served by the agency.
  - c. The remainder of the members of the board shall be members of business, industry, labor, religious, welfare, education, or other major groups or interests in the community.
2. Notwithstanding subsection 1, a public agency shall establish an advisory board to assist the governing board in meeting the requirements of section 216A.95. The advisory board shall be composed of the same type of membership as a board of directors for community action agencies under subsection 1. In addition, the advisory board of the community action agency shall have the sole authority to determine annual program budget requests.

86 Acts, ch 1245, §1243  
 C87, §601K.94  
 87 Acts, ch 115, §73; 90 Acts, ch 1242, §5  
 C93, §216A.94  
 93 Acts, ch 56, §1; 2010 Acts, ch 1031, §127, 170

**216A.95 Duties of board.**

1. The governing board or advisory board shall fully participate in the development, planning, implementation, and evaluation of programs to serve low-income communities.
2. The governing board may:
  - a. Own, purchase, and dispose of property necessary for the operation of the community action agency.
  - b. Receive and administer funds and contributions from private or public sources which may be used to support community action programs.
  - c. Receive and administer funds from a federal or state assistance program pursuant to which a community action agency could serve as a grantee, a contractor, or a sponsor of a project appropriate for inclusion in a community action program.

86 Acts, ch 1245, §1244  
 C87, §601K.95  
 C93, §216A.95  
 2010 Acts, ch 1031, §128, 170  
 Referred to in §216A.94

**216A.96 Duties of community action agency.**

A community action agency shall:

1. Plan and implement strategies to alleviate the conditions of poverty and encourage self-sufficiency for citizens in its service area and in Iowa. In doing so, an agency shall plan for a community action program by establishing priorities among projects, activities, and areas to provide for the most efficient use of possible resources.
2. Obtain and administer assistance from available sources on a common or cooperative basis, in an attempt to provide additional opportunities to low-income persons.
3. Establish effective procedures by which the concerned low-income persons and area residents may influence the community action programs affecting them by providing for methods of participation in the implementation of the community action programs and by providing technical support to assist persons to secure assistance available from public and private sources.
4. Encourage and support self-help, volunteer, business, labor, and other groups and organizations to assist public officials and agencies in supporting a community action program by providing private resources, developing new employment opportunities, encouraging investments in areas of concentrated poverty, and providing methods by which low-income persons can work with private organizations, businesses, and institutions in seeking solutions to problems of common concern.

86 Acts, ch 1245, §1245

C87, §601K.96

C93, §216A.96

2010 Acts, ch 1031, §129, 130, 170; 2011 Acts, ch 34, §49

**216A.97 Administration.**

A community action agency may administer the components of a community action program when the program is consistent with plans and purposes and applicable law. The community action programs may be projects which are eligible for assistance from any source. The programs shall be developed to meet local needs and may be designed to meet eligibility standards of a federal or state program.

86 Acts, ch 1245, §1246

C87, §601K.97

C93, §216A.97

2010 Acts, ch 1031, §131, 170; 2011 Acts, ch 34, §50

**216A.98 Audit.**

Each community action agency shall be audited annually but shall not be required to obtain a duplicate audit to meet the requirements of this section. In lieu of an audit by the auditor of state, the community action agency may contract with or employ a certified public accountant to conduct the audit, pursuant to the applicable terms and conditions prescribed by sections 11.6, 11.14, and 11.19 and an audit format prescribed by the auditor of state. Copies of each audit shall be furnished to the division in a manner prescribed by the division.

86 Acts, ch 1245, §1247

C87, §601K.98

89 Acts, ch 264, §9

C93, §216A.98

2010 Acts, ch 1031, §132, 170; 2011 Acts, ch 75, §36

**216A.99 Allocation of financial assistance.**

The administrator shall provide financial assistance for community action agencies to implement community action programs, as permitted by the community service block grant, administer the low-income energy assistance block grants, department of energy funds for weatherization received in Iowa, and other possible funding sources.

If a political subdivision is the agency, the financial assistance shall be allocated to the political subdivision.

86 Acts, ch 1245, §1248

C87, §601K.99

C93, §216A.99

216A.100 Reserved.

216A.101 Emergency weatherization fund. Repealed by 2010 Acts, ch 1031, §168, 170.

**216A.102 Energy crisis fund.**

1. An energy crisis fund is created in the state treasury. Moneys deposited in the fund shall be used to assist low-income families who qualify for the low-income home energy assistance program to avoid loss of essential heating.

2. The fund may receive moneys including, but not limited to, the following:

a. Moneys appropriated by the general assembly for the fund.

b. After July 1, 1988, unclaimed patronage dividends of electric cooperative corporations or associations shall be applied to the fund following the time specified in section 556.12 for claiming the dividend from the holder.

c. The fund may also receive contributions from customer contribution funds established under section 476.66.

3. Under rules developed by the division of community action agencies of the department of human rights and adopted by the board, the fund may be used to negotiate reconnection of essential utility services with the energy provider.

88 Acts, ch 1175, §6

C89, §601K.102

91 Acts, ch 270, §6

C93, §216A.102

2002 Acts, ch 1119, §146; 2008 Acts, ch 1126, §14, 33; 2010 Acts, ch 1031, §133, 170

216A.103 Iowa affordable heating program established. Repealed by 2010 Acts, ch 1031, §168, 170.

**216A.104 Energy utility assessment and resolution program.**

1. The general assembly finds that provision of assistance to prevent utility disconnections will also prevent the development of public health risks due to such disconnections. The division shall establish an energy utility assessment and resolution program administered by each community action agency for persons with low incomes who have or need a deferred payment agreement or are in need of an emergency fuel delivery to address home energy utility costs.

2. A person must meet all of the following requirements to be eligible for the program:

a. The person is eligible for the federal low-income home energy assistance program.

b. The person is a residential customer of an energy utility approved for the program by the division.

c. The person has or is in need of a deferred payment agreement to address the person's home energy utility costs.

d. The person is able to maintain or regain residential energy utility service in the person's own name.

e. The person provides the information necessary to determine the person's eligibility for the program.

- f.* The person complies with other eligibility requirements adopted in rules by the division.
  - 3. The program components shall include but are not limited to all of the following:
    - a.* Analysis of a program participant's current financial situation.
    - b.* Review of a program participant's resource and money management options.
    - c.* Skills development and assistance for a program participant in negotiating a deferred payment agreement with the participant's energy utility.
    - d.* Development of a written household energy affordability plan.
    - e.* Provision of energy conservation training and assistance.
    - f.* A requirement that a program participant must make uninterrupted, regular utility payments while participating in the program.
- 2007 Acts, ch 218, §136; 2010 Acts, ch 1031, §134, 170  
216A.105 and 216A.106 Reserved.

**216A.107 Family development and self-sufficiency — council and grant program.**

1. A family development and self-sufficiency council is established within the department of human rights. The council shall consist of the following persons:
  - a.* The director of the department of human services or the director's designee.
  - b.* The director of the department of public health or the director's designee.
  - c.* The administrator of the division of community action agencies of the department of human rights or the administrator's designee.
  - d.* The director of the school of social work at the university of Iowa or the director's designee.
  - e.* The dean of the college of human sciences at Iowa state university or the dean's designee.
  - f.* Two recipients or former recipients of the family investment program, selected by the other members of the council.
  - g.* One recipient or former recipient of the family investment program who is a member of a racial or ethnic minority, selected by the other members of the council.
  - h.* One member representing providers of services to victims of domestic violence, selected by the other members of the council.
  - i.* The head of the department of design, textiles, gerontology, and family studies at the university of northern Iowa or that person's designee.
  - j.* The director of the department of education or the director's designee.
  - k.* The director of the department of workforce development or the director's designee.
  - l.* Two persons representing the business community, selected by the other members of the council.
  - m.* Two members from each chamber of the general assembly serving as ex officio, nonvoting members. The two members of the senate shall be appointed one each by the majority leader and the minority leader of the senate. The two members of the house of representatives shall be appointed one each by the speaker and the minority leader of the house of representatives.
2. Unless otherwise provided by law, terms of members, election of officers, and other procedural matters shall be as determined by the council. A quorum shall be required for the conduct of business of the council, and the affirmative vote of a majority of the currently appointed voting members is necessary for any substantive action taken by the council. A member shall not vote on any action if the member has a conflict of interest on the matter, and a statement by the member of a conflict of interest shall be conclusive for this purpose.
3. The family development and self-sufficiency council shall do all of the following:
  - a.* Identify the factors and conditions that place Iowa families at risk of dependency upon the family investment program. The council shall seek to use relevant research findings and national and Iowa-specific data on the family investment program.
  - b.* Identify the factors and conditions that place Iowa families at risk of family instability. The council shall seek to use relevant research findings and national and Iowa-specific data on family stability issues.



c. Subject to the availability of funds for this purpose, award grants to public or private organizations for provision of family development services to families at risk of dependency on the family investment program or of family instability. Not more than five percent of any funds appropriated by the general assembly for the purposes of this lettered paragraph may be used for staffing and administration of the grants. Grant proposals for the family development and self-sufficiency grant program shall include the following elements:

- (1) Designation of families to be served that meet one or more criteria for being at risk of dependency on the family investment program or of family instability, and agreement to serve clients that are referred by the department of human services from the family investment program which meet the criteria. The criteria may include but are not limited to factors such as educational level, work history, family structure, age of the youngest child in the family, previous length of stay on the family investment program, and participation in the family investment program or the foster care program while the head of a household was a child. Grant proposals shall also establish the number of families to be served under the grant.
- (2) Designation of the services to be provided for the families served, including assistance regarding job-seeking skills, family budgeting, nutrition, self-esteem, methamphetamine education, health and hygiene, child rearing, child education preparation, and goal setting. Grant proposals shall indicate the support groups and support systems to be developed for the families served during the transition between the need for assistance and self-sufficiency.
- (3) Designation of the manner in which other needs of the families will be provided for, including but not limited to child care assistance, transportation, substance abuse treatment, support group counseling, food, clothing, and housing.
- (4) Designation of the process for training of the staff which provides services, and the appropriateness of the training for the purposes of meeting family development and self-sufficiency goals of the families being served.
- (5) Designation of the support available within the community for the program and for meeting subsequent needs of the clients, and the manner in which community resources will be made available to the families being served.
- (6) Designation of the manner in which the program will be subject to audit and to evaluation.
- (7) Designation of agreement provisions for tracking and reporting performance measures developed pursuant to paragraph "d".

d. Develop appropriate performance measures for the grant program to demonstrate how the program helps families achieve self-sufficiency.

e. Seek to enlist research support from the Iowa research community in meeting the duties outlined in paragraphs "a" through "d".

f. Seek additional support for the funding of grants under the program, including but not limited to funds available through the federal government in serving families at risk of long-term welfare dependency, and private foundation grants.

g. Make recommendations to the governor and the general assembly on the effectiveness of programs in Iowa and throughout the country that provide family development services that lead to self-sufficiency for families at risk of welfare dependency.

4. *a.* The division shall administer the family development and self-sufficiency grant program. The department of human services shall disclose to the division confidential information pertaining to individuals receiving services under the grant program, as authorized under section 217.30. The division and the department of human services shall share information and data necessary for tracking performance measures of the family development and self-sufficiency grant program, for referring families participating in the promoting independence and self-sufficiency through employment job opportunities and basic skills (PROMISE JOBS) program under section 239B.17 and related activities and programs to the grant program, and for meeting federal reporting requirements. The division and the department of human services may by mutual agreement, as specified in the memorandum of agreement entered into in accordance with paragraph “*b*”, add to or delete from the initial shared information items listed in this lettered paragraph. The initial shared information shall include but is not limited to all of the following:
  - (1) Family enrollments and exits to and from each of the programs.
  - (2) Monthly reports of individual participant activity in PROMISE JOBS components that are countable work activities according to federal guidelines applicable to those components.
  - (3) Aggregate grant program participant activity in all PROMISE JOBS program components.
  - (4) Work participation rates for grant program participants who were active family investment program participants.
  - (5) The average hourly wage of grant program participants who left the family investment program.
  - (6) The percentage of grant program participants who exited from the grant program at or after the time family investment program participation ended and did not reenroll in the family investment program for at least one year.
- b.* The division shall develop a memorandum of agreement with the department of human services to share outcome data and coordinate referrals and delivery of services to participants in the family investment program under chapter 239B and the grant program and other shared clients and shall provide the department of human services with information necessary for compliance with federal temporary assistance for needy families block grant state plan and reporting requirements, including but not limited to financial and data reports.
- c.* To the extent that the family development and self-sufficiency grant program is funded by the federal temporary assistance for needy families block grant and by the state maintenance of efforts funds appropriated in connection with the block grant, the division shall comply with all federal requirements for the block grant. The division is responsible for payment of any federal penalty imposed that is attributable to the grant program and shall receive any federal bonus payment attributable to the grant program.
- d.* The division shall ensure that expenditures of moneys appropriated to the department of human services from the general fund of the state for the family development and self-sufficiency grant program are eligible to be considered as state maintenance of effort expenditures under federal temporary assistance for needy families block grant requirements.
- e.* The commission shall consider the recommendations of the council in adopting rules pertaining to the grant program.
- f.* The division shall submit to the governor and general assembly on or before November 30 following the end of each state fiscal year, a report detailing performance measure and outcome data evaluating the family development and self-sufficiency grant program for the fiscal year that just ended.

2008 Acts, ch 1072, §1; 2010 Acts, ch 1031, §135, 170

Referred to in §232.69, §239B.8

Legislative appointments, see §69.16B

216A.108 through 216A.110 Reserved.

## 2021 IOWA ACTS, HOUSE FILE 895 – SECTIONS 8, 16, 17, 18, and 19

AN ACT APPROPRIATING FEDERAL MONEYS MADE AVAILABLE FROM FEDERAL BLOCK GRANTS AND OTHER NONSTATE SOURCES, ALLOCATING PORTIONS OF FEDERAL BLOCK GRANTS, AND PROVIDING PROCEDURES IF FEDERAL MONEYS OR FEDERAL BLOCK GRANTS ARE MORE OR LESS THAN ANTICIPATED, AND INCLUDING EFFECTIVE DATE AND RETROACTIVE APPLICABILITY PROVISIONS.

BE IT ENACTED BY THE GENERAL ASSEMBLY OF THE STATE OF IOWA:

**Sec. 8. COMMUNITY SERVICES APPROPRIATIONS.**

1. a. There is appropriated from the fund created by section 8.41 to the division of community action agencies of the department of human rights for the following federal fiscal years beginning October 1, and ending September 30, the following amounts:
 

FFY 2021-2022:.....	\$ 7,979,245
FFY 2022-2023:.....	\$ 7,979,245
  - b. The appropriations made in this subsection are in the amounts anticipated to be received from the federal government for the designated federal fiscal years under 42 U.S.C., ch. 106, which provides for the community services block grant. The division of community action agencies of the department of human rights shall expend the moneys appropriated in this subsection as provided in the federal law making the moneys available and in conformance with chapter 17A.
  - c. Each federal fiscal year, the administrator of the division of community action agencies of the department of human rights shall allocate not less than 96 percent of the amount of the block grants to eligible community action agencies for programs benefiting low-income persons. Each eligible agency shall receive a minimum allocation of not less than \$100,000. The minimum allocation shall be achieved by redistributing increased moneys from agencies experiencing a greater share of available moneys. The moneys shall be distributed on the basis of the poverty-level population in the area represented by the community action areas compared to the size of the poverty-level population in the state.
2. An amount not exceeding 4 percent of the moneys appropriated in subsection 1 for each federal fiscal year shall be used by the division of community action agencies of the department of human rights for administrative expenses. From the moneys set aside by this subsection for administrative expenses, the division of community action agencies of the department of human rights shall pay to the auditor of state an amount sufficient to pay the cost of auditing the use and administration of the state's portion of the moneys appropriated in subsection 1. The auditor of state shall bill the division of community action agencies for the costs of the audits.

**Sec. 16. PROCEDURE FOR REDUCED FEDERAL MONEYS.**

1. Unless otherwise necessary to meet federal requirements, if the moneys received from the federal government for the block grants specified in this Act are less than the amounts appropriated, the moneys actually received shall be prorated by the governor for the various programs, other than for the services to victims of sex offenses and for rape prevention education under section 4, subsection 3, of this Act, for which each block grant is available according to the percentages that each program is to receive as specified in this Act. However, if the governor determines that the moneys allocated by the percentages will not be sufficient to accomplish the purposes of a particular program, or if the appropriation is not allocated by percentage, the governor may allocate the moneys in a manner which will accomplish to the greatest extent possible the purposes of the various programs for which the block grants are available.
2. Before the governor implements the actions provided for in subsection 1, the following procedures shall be taken:
  - a. The chairpersons and ranking members of the senate and house standing committees on appropriations, the appropriate chairpersons and ranking members of subcommittees of those committees, and the director of the legislative services agency shall be notified of the proposed action.

- b. The notice shall include the proposed allocations, and information on the reasons why particular percentages or amounts of moneys are allocated to the individual programs, the departments and programs affected, and other information deemed useful. Chairpersons and ranking members notified shall be allowed at least two weeks to review and comment on the proposed action before the action is taken.

**Sec. 17. PROCEDURE FOR INCREASED FEDERAL MONEYS.**

1. Unless otherwise necessary to meet federal requirements, if moneys received from the federal government in the form of block grants exceed the amounts appropriated in sections 1, 2, 3, 4, 7, 9, and 12 of this Act, the excess shall be prorated to the appropriate programs according to the percentages specified in those sections, except additional moneys shall not be prorated for administrative expenses.
2. If actual moneys received from the federal government from block grants exceed the amount appropriated in section 11 of this Act for the low-income home energy assistance program, not more than 15 percent of the excess may be allocated to the low-income residential weatherization program and not more than 10 percent of the excess may be used for administrative costs.
3. If moneys received from the federal government from community services block grants exceed the amount appropriated in section 8 of this Act, 100 percent of the excess is allocated to the community services block grant program.

**Sec. 18. PROCEDURE FOR EXPENDITURE OF ADDITIONAL FEDERAL MONEYS.**

If other federal grants, receipts, and moneys and other nonstate grants, receipts, and moneys become available or are awarded which are not available or awarded during the period in which the general assembly is in session, but which require expenditure by the applicable department or agency prior to March 15 of the fiscal years beginning July 1, 2021, and July 1, 2022, these grants, receipts, and moneys are appropriated to the extent necessary, provided that the fiscal committee of the legislative council is notified within 30 days of receipt of the grants, receipts, or moneys and the fiscal committee of the legislative council has an opportunity to comment on the expenditure of the grants, receipts, or moneys.

**Sec. 19. OTHER GRANTS, RECEIPTS, AND MONEYS.**

Federal grants, receipts, and moneys and other nonstate grants, receipts, and moneys, available in whole or in part of the state fiscal years beginning July 1, 2021, and July 1, 2022, are appropriated to the following departments and agencies that are designated by and for the purposes set forth in the grants, receipts, or conditions accompanying the receipt of the moneys, unless otherwise provided by law:

1. Department of administrative services.
2. Department on aging.
3. Department of agriculture and land stewardship.
4. Office of auditor of state.
5. Department for the blind.
6. Iowa state civil rights commission.
7. College student aid commission.
8. Department of commerce.
9. Department of corrections.
10. Department of cultural affairs.
11. Economic development authority.
12. Department of education.
13. Iowa ethics and campaign disclosure board.
14. Iowa finance authority.
15. Offices of the governor and lieutenant governor.
16. Governor's office of drug control policy.
17. Department of human rights.
18. Department of human services.
19. Department of inspections and appeals.
20. Judicial branch.
21. Department of justice.
22. Iowa law enforcement academy.
23. Department of management.

24. Department of natural resources.
25. Board of parole.
26. Department of public defense.
27. Public employment relations board.
28. Department of public health.
29. Department of public safety.
30. State board of regents.
31. Department of revenue.
32. Office of secretary of state.
33. Iowa state fair authority.
34. Office for state-federal relations.
35. Iowa telecommunications and technology commission.
36. Office of treasurer of state.
37. Department of transportation.
38. Department of veterans affairs.
39. Department of workforce development.

## Iowa Administrative Code, 427-Chapter 22

### Community Services Block Grant

#### 427—22.1(216A) Purpose.

**22.1(1)** The community services block grant program as established by Title VI, Subtitle B, Public Law 97-35, as amended, the Omnibus Budget Reconciliation Act of 1981, makes available to the state of Iowa funds to be used:

- a. To provide a range of services and activities having a measurable and potentially major impact on causes of poverty in the community or those areas of the community where poverty is a particularly acute problem;
- b. To provide activities designed to assist low-income participants including homeless individuals and families, migrants, and the elderly poor:
  - (1) To secure and retain meaningful employment;
  - (2) To attain an adequate education;
  - (3) To make better use of available income;
  - (4) To obtain and maintain adequate housing and a suitable living environment;
  - (5) To obtain emergency assistance through loans or grants to meet immediate and urgent individual and family needs, including the need for health services, nutritious food, housing, and employment-related assistance;
  - (6) To remove obstacles and solve problems which block the achievement of self-sufficiency;
  - (7) To achieve greater participation in the affairs of the community; and
  - (8) To make more effective use of other programs related to the purposes of this program;
- c. To provide on an emergency basis for the provision of supplies and services, nutritious food-stuffs, and related services, as may be necessary to counteract conditions of starvation and malnutrition among the poor;
- d. To coordinate and establish linkages between governmental and other social services programs to ensure the effective delivery of services to low-income individuals; and
- e. To encourage the use of entities in the private sector of the community in efforts to ameliorate poverty in the community.

**22.1(2)** Reserved.

**427—22.2(216A) Definitions.** For the purpose of these rules, unless otherwise defined, the following shall govern:

*“CAA”* means community action agency.

*“Community action agency, community action program or eligible entity”* shall mean any organization which was officially recognized as a community action agency or a community action program under the provisions of Public Law 97-35, Subtitle B, section 673(1), as amended, and Iowa Code section 216A.91.

*“CSBG”* shall mean the community services block grant program.

*“DCAA”* means the division of community action agencies of the state department of human rights.

*“Poverty line”* means the official poverty line established by the director of the federal Office of Management and Budget. The Secretary of the Department of Health and Human Services revises the poverty line annually and this poverty line multiplied by 125 percent shall be used as a criteria of eligibility in the community services block grant program.

*“Program year”* refers to the year beginning October 1 and ending the succeeding September 30.

The program year is numbered for that year in which it ends. Funding may extend beyond the program year in which it is awarded.

*“Reduction”* means funding reduced below the proportional share of funding an eligible entity received in the previous fiscal year.

*“Suspension”* means temporary withdrawal of the eligible entity’s authority to obligate funds pending corrective action by the eligible entity.

*“Termination”* means permanent withdrawal of the eligible entity’s authority to obligate funds before that authority would otherwise expire. If an eligible entity’s authority to obligate funds is terminated, no funds may be obligated by the eligible entity after the effective date of the termination. It may also mean the voluntary relinquishment of this authority by the eligible entity.

**427—22.3(216A) Apportionment distribution.**

**22.3(1) Iowa apportionment.** There is appropriated to DCAA from the fund created by Iowa Code section 8.41, subsection 1, funds to implement the community services block grant as described under Public Law 97-35, Title VI, Subtitle B, as amended. The agency shall expend the funds appropriated as provided in the federal law, making the funds available in conformance with these rules.

**22.3(2) Distribution to eligible entities.** An amount no less than 96 percent of the funds received according to subrule 22.3(1) shall be distributed to eligible entities in accordance with 1994 Iowa Acts, chapter 1194. The administrator of the division of community action agencies of the department of human rights shall allocate not less than 96 percent of the amount of the block grant to eligible community action agencies for programs benefitting low-income persons. Each eligible agency shall receive a minimum allocation of no less than \$100,000. The minimum allocation shall be achieved by proportionately redistributing increased funds from agencies experiencing a greater share of available funds. The remaining funds shall be distributed on the basis of the poverty-level population in the area represented by the community action agencies compared to the size of the poverty-level population in the state as established by the federal poverty guidelines as published by the United States Department of Health and Human Services.

**22.3(3) Poverty-level population.** The state shall use U.S. census statistics to determine the poverty-level population in each community action area.

**22.3(4) State administrative fees.** DCAA shall reserve for its administrative expenses of the program no more than 4 percent of the state's apportioned amount described in subrule 22.3(1).

**22.3(5) Local share.** There shall be no local share required under this program.

**427—22.4(216A) Eligibility requirements.** The eligibility requirements for participation in the community services block grant program are as follows:

**22.4(1) Organization.** The organization must meet the definition of an eligible entity as defined in rule 22.2(216A).

**22.4(2) Accounting system.** Any private agency must obtain an accounting system certification in accordance with Iowa Code section 11.36, if the total amount of grants and contracts received by the organization from the state during the program year will exceed \$150,000.

**22.4(3) Board composition.** A recognized community action agency shall be governed by a board of directors composed of at least nine members. The board membership shall be as follows:

- a. One-third of the members of the board shall be elected public officials currently holding office or their representatives. However, if the number of elected officials available and willing to serve is less than one-third of the membership of the board, the membership of the board consisting of appointive public officials may be counted as fulfilling the requirement that one-third of the members of the board be elected public officials. Ch 22, p.3 Community Action Agencies[427]
- b. At least one-third of the members of the board shall be chosen in accordance with procedures established by the community action agency to ensure representation of the poor in an area served by the agency.
- c. The remainder of the members of the board shall be members of business, industry, labor, religious, welfare, education, or other major groups or interests in the community.

**22.4(4) Public agency advisory boards or delegate agencies.** Notwithstanding subrule 22.4(3), a public agency which is acting as a community action agency shall establish an advisory board or may contract with a delegate agency to assist the governing board. The advisory board or delegate agency board shall be composed of the same type of membership as a board of directors under subrule 22.4(3). The advisory board or delegate agency board shall comply with the duties required for the board of directors for the community action agencies as provided in Iowa Code section 216A.95. However, the public agency acting as the community action agency shall determine annual program budget requests.

**22.4(5) Ineligible recipients.** Individuals, political parties and for-profit organizations, partnerships and corporations are ineligible for direct assistance from the state under this program.

**427—22.5(216A) Community action plan.** All eligible entities shall submit a proposed community action plan for the purpose of applying for funds. The allocation of funds to eligible entities is on a noncompetitive basis.

**22.5(1) Timing.** Eligible entities shall be informed in writing by the DCAA of the due date for the community action plan and the amount of their allocation in accordance with subrule 22.3(2).

**22.5(2) Contents.** Instructions for preparing a proposed community action plan shall be provided by the DCAA to all eligible entities. In addition to other information specified in the instructions, approvable community action plans will include:

- a. A community needs assessment (including food needs);
- b. A description of the service delivery system targeted to low-income individuals and families in the service area;
- c. A description of how linkages will be developed to fill identified gaps in services through information, referral, case management, and follow-up consultations;
- d. A description of how funding will be coordinated with other public and private resources; and
- e. A description of outcome measures to be used to monitor success in promoting self-sufficiency, family stability, and community revitalization.

Further information concerning community action plan requirements may be obtained by writing the Department of Human Rights, Division of Community Action Agencies, Bureau of Community Services, Capitol Complex, Des Moines, Iowa 50319, or telephoning (515)281-3951.

**22.5(3) Nondiscrimination provisions.** Applicants must ensure in their community action plans that no person shall on the ground of race, color, national origin, or sex be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity funded in whole or in part with funds made available under this program. Any prohibition against discrimination on the basis of age under the Age Discrimination Act of 1975, or with respect to an otherwise qualified disabled individual under Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act of 1990, shall also apply to any such program or activity.

**22.5(4) Statewide needs assessment.** Applicants must participate in a statewide, comprehensive needs assessment at least once every three years. The needs assessment shall identify the causes and conditions of poverty in each community action area and throughout the entire state. The results of the study shall be used to plan activities contained in the community action plan.

**427—22.6(216A) Review and approval of community action plans.**

**22.6(1) Compliance review.** All activities proposed for funding shall be reviewed by community services block grant personnel for:

- a. Compliance with the specific purposes outlined in rule 22.1(216A);
- b. Inclusion of assurances that the applicant will conduct the program in compliance with all applicable laws;
- c. Inclusion and proper completion of all forms and instructions included in the request for community action plans; and
- d. Compliance with subrule 22.4(2) relative to obtaining an accounting system certification.

**22.6(2) Performance.** Approval of community action plans is dependent on the satisfactory performance of the applicant in the past funding year(s). The minimum standards include: timely and adequate expenditure report submission, program report submission, prudent management of funds, conformance with state and federal law relative to the restrictions in the use of funds, and adequate record keeping. Additionally, available records, audits and determinations from the Office of Community Services - Department of Health and Human Services, Office of Management and Budget, Division of Community Action Agencies, Iowa Department of Public Health, and other relevant state and federal agencies shall be utilized to the extent possible. Unresolved audit questions and past-due audits shall be a basis for conditional approval or disapproval of a proposed community action plan.



**427—22.7(216A) Payments.**

**22.7(1) Method of payment.** Any entity receiving a grant under the community services block grant program shall submit a monthly requisition packet consisting of the following forms:

- a. Monthly advance request and expenditure report containing a breakdown of the monthly expenditures of the entity in carrying out the activities funded through the grant;
- b. State of Iowa claimant's certification for reimbursement of funds. DCAA may refuse reimbursement of funds for good reason such as evidence of fraud, lack of management controls, or non-compliance with grant conditions. Refusal shall be appropriately documented, and the grantee shall be informed of the reason for the refusal and remedial actions they may take.

**22.7(2) Receipt of federal funds.** All payments shall be subject to the receipt of federal grant funds by DCAA. The termination, reduction or delay of federal grant funds to the DCAA shall, at their option, be reflected in a corresponding modification to grants already made.

**22.7(3) Equipment purchases.** Equipment purchases must be approved in writing by the governing board for any piece of equipment involving over \$500 of CSBG funds. Additionally, prior state approval of the purchases must be requested by the chairperson and approved by the DCAA.

**22.7(4) Miscellaneous expenses.** Any miscellaneous expenditures involving over \$300 per purchase of CSBG funds must be itemized by expense and amount on the monthly CSBG expenditure report.

**427—22.8(216A) Amendments.** Following are requirements applying to grant amendments.

**22.8(1) Budget.** Any expenditure of funds on a cost category which will exceed that cost category budgeted amount by more than 10 percent must be approved by an amendment to the grant. The total amount of the budget shall not be exceeded and any amounts above the budget total shall not be reimbursable by DCAA unless an amendment has been granted to increase the total. All requests for budget amendments must be approved in writing by the governing board and requested by the chairperson. Budget amendments requested that will have an impact on the approved CSBG work program must be accompanied by a corresponding work program amendment request.

**22.8(2) Work program.** Any change in scope or emphasis among projects funded in the grant must be reflected through a work program amendment. All requests for work program amendments must be approved in writing by the governing board and requested by the chairperson. Work program amendment requests shall provide the reason(s) for the proposed change in adequate detail to facilitate review by DCAA. A reduction in scope shall be evaluated by DCAA to determine what reduction in funds, if any, will be required.

**22.8(3) Recapture of funds.** If at any time during the program year it becomes apparent that the amount allocated to any entity is not being utilized at a rate sufficient to expend their available program funds, the agency may require that the entity amend their grant to release the excess funds. The funds may then be distributed by DCAA to those entities demonstrating the need and ability to appropriately expend the funds, or may be set aside for reappropriation by the general assembly.

**22.8(4) Other requests.** Requests for amendments other than those addressed in this rule, shall be considered on a case-by-case basis in conformance with applicable state and federal laws.

**427—22.9(216A) Ineligible items.** Ineligible activities or costs are as follows:

**22.9(1) Political activity.** Rescinded IAB 12/7/94, effective 1/11/95.

**22.9(2) Voter assistance.** Any activities to provide voters and prospective voters with transportation to the polls or provide similar assistance in connection with an election or any voter registration activity.

**22.9(3) Land and buildings.** The purchase or improvement of land, or the purchase, construction, or improvement (other than low-cost residential weatherization or other energy-related home repairs) of any building or other facility. Exceptions to this shall only be provided through the waiver procedure described in section 680, subsection (b), Public Law 97-35 as amended.

**427—22.10(216A) Audits and records.** Each recipient shall be responsible for the maintenance of appropriate accounting records necessary for the protection of program funds and shall arrange and pay for an annual audit of each grant made under this program, to be submitted within 90 days of the end of the recipient's fiscal year. Audits shall be performed in accordance with generally accepted auditing standards including the standards published by the general accounting office, "Standards for Audit of Governmental Organizations, Programs, Activities and Functions." The audit report shall conform to the audit format established for community action agencies by the state auditor. Audit procedures shall conform to OMB Circular A-128, "Audits of State and Local Governments." In addition, DCAA may request more frequent audits or examinations of financial records of the recipient in order to ensure adequate financial controls are in place and operating.

**427—22.11(216A) Termination of affiliation.** In the event that a political subdivision desires to terminate affiliation with a community action agency currently serving it, the following procedure shall be used:

**22.11(1)** The board of supervisors or the city council as the case may be will vote to consider:

- a. Withdrawal from the service area of the CAA.
- b. Revocation of their original designation (if applicable) of the CAA for that area.
- c. A proposal to affiliate with another CAA.

**22.11(2)** The political subdivision shall hold a public hearing for review and comment on the pro-proposed change.

**22.11(3)** At the next regular meeting of the board or council after the public hearing, a final vote on the resolution shall be taken.

**22.11(4)** If the board or council votes in favor of terminating affiliation with the community action agency, DCAA shall be provided a written notice within ten days including the following information:

- a. Official notification of the vote to terminate the affiliation.
- b. A summary of the public comment received by the political subdivision in regard to the pro-proposed termination and affiliation with other CAAs.
- c. The political subdivision's recommendation for affiliation with another CAA.

**22.11(5)** In accordance with Public Law 97-35, Title VI, Subtitle B, as amended, and rule 22.12(216A), the division administrator of DCAA shall accept, reject, or modify the proposed termination and recommendation for affiliation with another CAA.

**427—22.12(216A) Establishing new designation.**

**22.12(1)** In any geographic area of the state not served by a CAA due to termination of affiliation, the division administrator of DCAA may decide to serve that area by: Ch 22, p.6 Community Action Agencies [427]

- a. Requesting an existing eligible entity which is located and provides services in an area contiguous to the unserved area to serve the unserved area;
- b. If no existing CAA eligible entity is located and provides services in an area contiguous to the unserved new area, requesting the CAA eligible entity located closest to the area to be served or existing CAA eligible entity serving an area within reasonable proximity of the unserved new area to provide services in the unserved new area; or
- c. Where no existing CAA requested to serve the unserved area decides to do so, designating any organization which has a board meeting the requirement of rule 22.4(216A), or any political subdivision of the state to serve the unserved area.

The designation of an organization which has a board meeting the requirements of rule 22.4(216A) or a political subdivision of the state to serve the unserved area shall qualify the organization as an eligible entity under Public Law 97-35, Subtitle B, as amended.

**22.12(2)** DCAA shall conduct a minimum of one public hearing in the affected geographic area to solicit public input concerning the proposed designation. Factors to be considered in reaching a designation decision shall include determination of the most efficient service delivery mechanism, transition time, local views and issues, types of services to be provided, funds available, potential disruption of service to the eligible population, and other relevant data. Utmost consideration shall be given to the views and wishes of local elected officials and citizens in the unserved area in making a new designation. If necessary, DCAA shall alter the amount of CSBG funding to be received by affected CAAs as a result of the new designation.

**427—22.13(216A) Suspension of CSBG funding.**

**22.13(1) *Suspension in general.*** The division administrator of DCAA may suspend CSBG funds to an eligible entity if monitoring, evaluation, or audits reveal significant noncompliance with established state or federal policies, contract requirements, DCAA directives, fiscal procedures, program performance targets, or other willful or negligent failure on the part of the eligible entity to perform its responsibilities. Action to suspend funding will only be taken after less drastic remedies have been tried unless DCAA determines that immediate action is necessary due to the seriousness of the violation or is necessary to protect CSBG funds or property. Serious violations would include, but would not necessarily be limited to, evidence of fraud, embezzlement or gross mismanagement.

**22.13(2) *Written notification of suspension.*** DCAA shall provide a written “notification of suspension” by certified mail to the chairperson of the governing board of the eligible entity to effectuate the process of suspension. The “notification of suspension” shall specify the reason(s) for the suspension and the effective date of the suspension. In all but extreme cases, eligible entities will be given a reasonable period of time (but in no case more than 60 days) to make necessary improvements, whereupon funding may resume. In extreme cases, when the division administrator of DCAA has determined termination of CSBG funding is appropriate in accordance with rule 22.14(216A), the “notification of suspension” shall be accompanied by a “notification of intent to terminate” as described in rule 22.14(216A).

**427—22.14(216A) Termination of CSBG funding.**

**22.14(1) *Termination in general.*** The division administrator of DCAA may terminate CSBG funds to an eligible entity after suspension of CSBG funding in any of the following instances:

- a. The division administrator determines that the governing board of the eligible entity cannot or will not take the necessary action to bring the eligible entity into compliance within the time allowed by DCAA.
- b. The division administrator determines that the nature or extent of noncompliance is extreme and warrants immediate termination of CSBG funding.
- c. The eligible entity is no longer officially recognized as a CAA by DCAA as a result of termination of affiliation procedures described in rule 22.11(216A).
- d. The material failure of the eligible entity to comply with the terms of its agreement and community action plan to provide services.

**22.14(2) *Written notification of intent to terminate.*** DCAA shall provide a written “notification of intent to terminate” by certified mail to the chairperson of the governing board of the eligible entity to effectuate the termination of CSBG funding. The “notification of intent to terminate” shall include:

- a. The reason(s) for the termination;
- b. A notice of a hearing to be held to consider the intended termination including:
  - (1) A statement of the date, time, place, nature, and manner of the hearing;
  - (2) A statement of the legal authority and jurisdiction under which the hearing is to be held;
  - (3) Reference to the particular sections of the statutes, rules, or regulations involved;
  - (4) A short, plain statement of the matters asserted. If the state is unable to recite the matters in detail at the time the notice is given, the notice may be limited to a statement of the issues involved;
  - (5) A statement informing all parties of their opportunity at a hearing:
    1. To request rescheduling of the hearing for good cause;
    2. To be represented by an attorney or other representative of their choice;
    3. To introduce into the record documentary evidence and bring witnesses to the hearing;
    4. To have records or documents relevant to the issues produced by their custodian when the records or documents are kept by or for the state, contractor or its subcontractor in the ordinary course of business and where prior reasonable notice has been given to the presiding officer;
    5. To question any witnesses or parties; and
    6. A final written decision provided by the division administrator of DCAA within 30 days of the hearing.

**22.14(3) Prehearing subpoena and discovery rights and procedures.** The presiding officer shall, upon request, issue subpoenas in accordance with the provisions of Iowa Code section 17A.13.

**22.14(4) Conduct of hearing.**

- a. The hearing shall be held within 30 days of the date of the “notification of intent to terminate.”
- b. The hearing may be conducted in whole or in part by telephone. When it is impractical for the state to conduct an in-person hearing, unless either party objects, a telephone hearing may be scheduled.
- c. After the presiding officer has called the hearing to order, the parties may be given an opportunity to present opening statements; thereafter the parties shall present their evidence in sequence determined by the presiding officer.
- d. When a witness is introduced to provide testimony or evidence in a contested case hearing, the witness shall, prior to testifying, be identified by name and address and shall take an oath or affirmation administered by the presiding officer.
- e. The rules of evidence and the contents of the record shall be as allowed under Iowa Code sections 17A.12(7) and 17A.14.

**22.14(5) Decision.** The decision shall conform to the following requirements:

- a. The presiding officer shall within 20 days following the hearing provide the division administrator of DCAA with a proposed decision.
- b. The division administrator of DCAA shall within 30 days following the hearing issue a final decision on behalf of the state.
- c. A proposed or final decision shall include findings of fact and conclusions of law, separately stated. Findings of fact shall be based solely on the evidence in the record and on matters officially noticed in the record, and, if set forth in statutory language, shall be accompanied by a concise and explicit statement of underlying facts supporting the findings. Each conclusion of law shall be supported by cited authority or by reasoned opinion.

**22.14(6) Review by the Secretary of Health and Human Services.** In accordance with Public Law 97-35, as amended, the Secretary of the U.S. Department of Health and Human Services shall be requested by the state to review any termination of funding to a community action agency, or migrant and.Ch. 22, p.8 Community Action Agencies [427] seasonal farmworker organization. As stated in Public Law 97-35, as amended, the review shall be conducted promptly and shall be based upon the record. No decision shall become effective until a finding by the Secretary of Health and Human Services confirming the state’s finding of cause for termination.

#### **427—22.15(216A) Reduction of CSBG funding.**

**22.15(1) Reduction in general.** The division administrator of the DCAA may reduce CSBG funds to an eligible entity at any point in the grant cycle if the state determines that cause exists. Cause includes:

- a. A statewide redistribution of CSBG funds to respond to:
  - (1) The results of the recently available census or other appropriate data;
  - (2) The establishment of a new eligible entity;
  - (3) Severe economic dislocation; and
- b. The failure of the eligible entity to comply with the terms of its agreement to provide CSBG services.

**22.15(2) Written notification of reduced funding.** The DCAA shall provide a written notification to the eligible entity to be affected by reduced funding. The eligible entity may request a hearing to be held to examine whether cause exists for the planned reduction in funding. The eligible entity must request the hearing in writing to the DCAA within ten days of its receipt of a notification of the planned reduction in funding to impel a hearing. The hearing process shall follow that outlined in rule 22.14(216A) pertaining to prehearing subpoena and discovery rights and procedures, conduct of hearing, decision and review by the Secretary of Health and Human Services.

These rules are intended to implement Iowa Code sections 216A.91 to 216A.103, Public Law 97-35as amended, Public Law 103-252, Public Law 103-94, 1990 Iowa Acts, chapter 1263, section 3, and 1994 Iowa Acts, chapter 1194.

[Filed emergency 9/25/81—published 10/14/81, effective 9/25/81 to 10/31/82]  
[Filed 4/23/82, Notice 10/14/81—published 5/12/82, effective 6/18/82]  
[Filed 4/22/83, Notice 11/10/82—published 5/11/83, effective 6/15/83]  
[Filed 4/14/86, Notice 1/29/86—published 5/7/86, effective 6/11/86]  
[Filed 12/10/86, Notice 11/5/86—published 12/31/86, effective 2/4/87]  
[Filed without Notice 7/24/87—published 8/12/87, effective 10/1/87]  
[Filed 9/15/88, Notice 8/10/88—published 10/5/88, effective 11/9/88]\*  
[Filed 12/20/89, Notice 11/15/89—published 1/10/90, effective 2/14/90]  
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[Filed 4/25/91, Notice 3/20/91—published 5/15/91, effective 6/19/91]  
[Filed 5/20/92, Notice 4/15/92—published 6/10/92, effective 7/15/92]  
[Filed emergency 9/30/94—published 10/26/94, effective 10/1/94]  
[Filed 11/17/94, Notice 8/31/94—published 12/7/94, effective 1/11/95]

Notice of public inspection and public hearing news release:

A copy of the news release will be included here.



Governor Kim Reynolds  
Lt. Governor Adam Gregg  
San Wong, Director

July 21, 2021

TO: DCAA Commissioner

FROM: Greg A. Pieper

A handwritten signature in blue ink, appearing to be "GAP", is written over the name "Greg A. Pieper".

RE: Iowa's Proposed FY 2022-2023 CSBG State Plan and Application

Attached are a copy of Iowa's proposed FY 2022-2023 CSBG State Plan and Application (with attachments) and a copy of the notice of public inspection and public hearing.

During the August 20th commission meeting the DCAA will review and answer any questions regarding the State Plan. Once the State Plan is approved by the commission, it will be submitted to the U. S. Department of Health and Human Services, Office of Community Services. It is due September 1st.

If you have any questions prior to the August 20th meeting, please contact me at (515) 281-0474 or [Greg.Pieper@iowa.gov](mailto:Greg.Pieper@iowa.gov).

Thank you.


Attachments



Governor Kim Reynolds  
Lt. Governor Adam Gregg  
San Wong, Director

July 21, 2021

TO: Iowa Community Action Agencies  
Iowa Community Action Association

FROM: Greg A. Pieper 

RE: Iowa's Proposed FY 2022-2023 CSBG State Plan and Application

Attached are a copy of Iowa's proposed FY 2022-2023 CSBG State Plan and Application (with attachments) and a copy of the notice of public inspection and public hearing.

Please post the State Plan and notice on your association's website or agency's website during the public inspection and comment period (July 26th through August 10th). Additionally, please post (e.g. bulletin board) the notice at your offices that will be open to the public during the inspection period.

The State Plan public hearing is scheduled for August 11th. Details about the public hearing are included in the attached notice.

The Iowa Commission on Community Action Agencies has a meeting on August 20th to discuss and finalize the State Plan. Once the State Plan is approved by the commission, it will be submitted to the U. S. Department of Health and Human Services, Office of Community Services. It is due September 1st.

We are planning to attend your August 5th ICAA board meeting to discuss the State Plan and to get final feedback. If you have any questions prior to the August 5th meeting, please contact me at (515) 281-0474 or [Greg.Pieper@iowa.gov](mailto:Greg.Pieper@iowa.gov).

Thank you.

Attachments





Governor Kim Reynolds  
Lt. Governor Adam Gregg  
San Wong, Director

**NOTICE OF PUBLIC INSPECTION AND PUBLIC HEARING**

**IOWA COMMUNITY SERVICES BLOCK GRANT PROGRAM**

DES MOINES – Iowans have an opportunity to inspect and comment on Iowa's proposed FFY 2022-2023 Community Services Block Grant (CSBG) State Plan and Application.

The purpose of the federal CSBG Program is to provide assistance to states and local communities, working through a network of community action agencies and other neighborhood-based organizations, for the reduction of poverty, revitalization of low-income communities, and the empowerment of low-income families and individuals in rural and urban areas to become fully self-sufficient. The Iowa Department of Human Rights, Division of Community Action Agencies (DCAA) administers Iowa's CSBG Program and is authorized by Iowa law to contract and distribute Iowa's CSBG Program funds to Iowa's community action agencies.

The proposed application will be available on the DCAA's website (<https://humanrights.iowa.gov/dcaa/csbk/csbk-resources>) through August 10, 2021. The inspection and comment period are from July 26, 2021, through August 10, 2021. All comments must be e-mailed to the following DCAA address prior to August 11, 2021, to be considered:

E-mail Address: [dcaa@iowa.gov](mailto:dcaa@iowa.gov)

Subject: Comments – CSBG State Plan

A virtual public hearing on the proposed application will be held from 9:00 – 10:00 a.m. on August 11, 2021. A link to the public hearing will be posted on the DCAA's website at least 20 minutes prior to the public hearing start time.

The proposed application is subject to change based on comments received and regulations from the U. S. Department of Health and Human Services.

# Iowa Legislature

## Public Hearings

### General Requirements:

Speaking time will be 2 minutes per individual and will alternate pro/con for as long as possible (written testimony is encouraged but not required).

This will be an in person event held at the Capitol, Room 103. If you sign up to speak, you must speak in person at the event. The meeting will be live streamed via YouTube for those that want to watch it. The link will be available 60 minutes prior to the meeting starting on the Legislative Home Page.

Persons wishing to speak or leave comments available to the public via the legislative website may sign up electronically at [Public Hearing](#).

### Public Hearings and times are as follows:

HSB 276 - A bill for an act appropriating federal moneys made available from federal block grants and other nonstate sources, allocating portions of federal block grants, and providing procedures if federal moneys or federal block grants are more or less than anticipated, and including effective date and retroactive applicability provisions.

Sponsored by the Appropriations Committee

Thursday, May 6, 2021

5:00 PM (introductions begin)

6:00 PM (conclusion of the hearing)

RM 103, Sup. Ct. Chamber

# Public Hearings

**General Assembly: 89 (01/11/2021 - 01/08/2023)**



Date	Location	Bill/Subject	Agenda	Notices	Signup / Comment	View Comments	View Sign Ups	Video
05/06/2021 5:00 PM	RM 103, Sup. Ct. Chamber	HSB 276	Discussion of HSB 276	Notices	Sign up Closed	View Comments	View Sign Ups	
04/20/2021 5:00 PM	RM 103, Sup. Ct. Chamber	HF 814	Discussion of HF 814	Notices	Sign up Closed	View Comments	View Sign Ups	
02/22/2021 5:00 PM	Room 103-Sup. Ct. Chamber	HF 590	Public Hearing for HF 590	Notices	Sign up Closed	View Comments	View Sign Ups	

# Public Hearing Video

## Public Hearings and times are as follows:

HSB 276 - A bill for an act appropriating federal moneys made available from federal block grants and other nonstate sources, allocating portions of federal block grants, and providing procedures if federal moneys or federal block grants are more or less than anticipated, and including effective date and retroactive applicability provisions.

Sponsored by the Appropriations Committee

Thursday, May 6, 2021

5:00 PM (introductions begin)

6:00 PM (conclusion of the hearing)

RM 103, Sup. Ct. Chamber

### Public Hearing HSB 276



**CSBG Eligible Entities**  
(Iowa Community Action Agencies)

**New Opportunities, Inc.**

23751 Highway 30 East – P.O. Box 427

Carroll, IA 51401

(712) 792-9266

NONPROFIT

COMMUNITY ACTION AGENCY

Service Area (Counties): Audubon, Calhoun, Carroll, Dallas, Greene, Guthrie, and Sac

**Hawkeye Area Community Action Program, Inc.**

1515 Hawkeye Drive – P.O. Box 490

Hiawatha, IA 52233

(319) 393-7811

NONPROFIT

COMMUNITY ACTION AGENCY

Service Area (Counties): Benton, Delaware, Dubuque, Iowa, Jackson, Johnson, Jones, Linn, and Washington

**Community Action of Eastern Iowa**

500 East 59th Street

Davenport, IA 52807

(563) 324-3236

NONPROFIT

COMMUNITY ACTION AGENCY

Service Area (Counties): Cedar, Clinton, Muscatine, and Scott

**MATURA Action Corporation**

207B N Elm Street

Creston, IA 50801

(641) 782-8431

NONPROFIT

COMMUNITY ACTION AGENCY

Service Area (Counties): Adair, Adams, Madison, Ringgold, Taylor, and Union

**Mid-Iowa Community Action, Inc.**

1001 South 18th Avenue

Marshalltown, IA 50158

(641) 752-7162

NONPROFIT

COMMUNITY ACTION AGENCY

Service Area (Counties): Hardin, Marshall, Poweshiek, Story, and Tama

**Mid-Sioux Opportunity, Inc.**

418 S Marion Street

Remsen, IA 51050

(712) 786-2001

NONPROFIT

COMMUNITY ACTION AGENCY

Service Area (Counties): Cherokee, Ida, Lyon, Plymouth, and Sioux

**North Iowa Community Action Organization**

218 5th Street SW – P.O. Box 1627

Mason City, IA 50402

(641) 423-8993

NONPROFIT

COMMUNITY ACTION AGENCY

Service Area (Counties): Butler, Cerro Gordo, Floyd, Franklin, Hancock, Kossuth, Mitchell, Winnebago, and Worth

**Northeast Iowa Community Action Corporation**

305 Montgomery – P.O. Box 487

Decorah, IA 52101

(563) 382-8436

NONPROFIT

COMMUNITY ACTION AGENCY

Service Area (Counties): Allamakee, Bremer, Chickasaw, Clayton, Fayette, Howard, and Winneshiek

**Operation Threshold**

1535 Lafayette Street – P.O. Box 4120

Waterloo, IA 50704

(319) 291-2065

NONPROFIT

COMMUNITY ACTION AGENCY

Service Area (Counties): Black Hawk, Buchanan, and Grundy

**IMPACT Community Action Partnership**

3226 University Avenue

Des Moines, IA 50311

(515) 274-1334

NONPROFIT

COMMUNITY ACTION AGENCY

Service Area (Counties): Boone, Jasper, Marion, Polk, and Warren

**South Central Iowa Community Action Program, Inc.**

1711 Osceola Avenue – Suite 103 – P.O. Box 715

Chariton, IA 50049

(641) 774-8133

NONPROFIT

COMMUNITY ACTION AGENCY

Service Area (Counties): Clarke, Decatur, Lucas, Monroe, and Wayne

**Community Action of Southeast Iowa**

2850 Mt. Pleasant Street – Suite 108

Burlington, IA 52601

(319) 753-0193

NONPROFIT

COMMUNITY ACTION AGENCY

Service Area (Counties): Des Moines, Henry, Lee, and Louisa

**Sieda Community Action**

725 West 2nd Street – P.O. Box 658

Ottumwa, IA 52501

(641) 682-8741

NONPROFIT

COMMUNITY ACTION AGENCY

Service Area (Counties): Appanoose, Davis, Jefferson, Keokuk, Mahaska, Van Buren, and Wapello

**Upper Des Moines Opportunity, Inc.**

101 Robins Street – P.O. Box 519

Graettinger, IA 51342

(712) 859-3885

NONPROFIT

COMMUNITY ACTION AGENCY

Service Area (Counties): Buena Vista, Clay, Dickinson, Emmet, Hamilton, Humboldt, O'Brien, Osceola, Palo Alto, Pocahontas, Webster, and Wright

**West Central Community Action**

1408A Highway 44 – P.O. Box 709

Harlan, IA 51537

(712) 755-5135

NONPROFIT

COMMUNITY ACTION AGENCY

Service Area (Counties): Cass, Crawford, Fremont, Harrison, Mills, Monona, Montgomery, Page, Pottawattamie, and Shelby

**Community Action Agency of Siouxland**

2700 Leech Avenue

Sioux City, IA 51106

(712) 274-1610

NONPROFIT

COMMUNITY ACTION AGENCY

Service Area (County): Woodbury

## PLANNED ALLOCATION (FFY 2022)

**DISTRIBUTION:**

Iowa's CSBG Allotment	\$7,953,018	
CSBG Eligible Entities	\$7,634,898	96%
State CSBG Office Admin	\$318,120	4%

**ALLOCATIONS:**

<b>CSBG ELIGIBLE ENTITIES</b>	<b>2010 ACS</b>	<b>MINIMUM ALLOCATION ADJUSTMENTS</b>				<b>FUNDING AMOUNT</b>
New Opportunities	3.2861%	\$250,890				\$250,890
HACAP	17.3277%	\$1,322,952		25.6413%	(\$18,017)	\$1,304,935
CAEI	9.4138%	\$718,734				\$718,734
MATURA	1.8483%	\$141,116	\$160,000	\$18,884		\$160,000
MICA	7.2489%	\$553,446		8.9984%	(\$6,323)	\$547,123
Mid-Sioux Opportunity	1.8162%	\$138,665	\$160,000	\$21,335		\$160,000
NICAO	4.6005%	\$351,243				\$351,243
NEICAC	3.6693%	\$280,147				\$280,147
Operation Threshold	6.5901%	\$503,147				\$503,147
IMPACT	16.4927%	\$1,259,201		60.3650%	(\$42,416)	\$1,216,785
SCICAP	1.7021%	\$129,954	\$160,000	\$30,046		\$160,000
CASEI	4.1146%	\$314,146		4.9953%	(\$3,510)	\$310,636
Sieda	4.8904%	\$373,377				\$373,377
UDMO	5.8376%	\$445,695				\$445,695
WCCA	7.1774%	\$547,987				\$547,987
CAAS	3.9843%	\$304,197				\$304,197
<b>TOTAL</b>	<b>100.0000%</b>	<b>\$7,634,898</b>	<b>\$70,266</b>	<b>100.0000%</b>	<b>(\$70,266)</b>	<b>\$7,634,898</b>



**Monitoring of CSBG Eligible Entities**  
(Iowa Community Action Agencies)  
FFY 2022 and FFY 2023

**New Opportunities, Inc.**

NO REVIEW

N/A

N/A

Last: August 29-30, 2018    Scheduled: August 25-26, 2021

**Hawkeye Area Community Action Program, Inc.**

NO REVIEW

N/A

N/A

Last: July 14, 2021 (full desk-review completed)

**Community Action of Eastern Iowa**

FULL ONSITE

ONSITE REVIEW

FY 2022 (Q3)

Last: May 2-3, 2019

**MATURA Action Corporation**

NO REVIEW

N/A

N/A

Last: July 31, 2018    Scheduled: September 28-29, 2021

**Mid-Iowa Community Action, Inc.**

FULL ONSITE

ONSITE REVIEW

FY 2023 (Q4)

Last: September 22, 2020 (full desk-review completed)

**Mid-Sioux Opportunity, Inc.**

FULL ONSITE

ONSITE REVIEW

FY 2023 (Q4)

Last: September 1, 2020 (full desk-review completed)

**North Iowa Community Action Organization**

FULL ONSITE

ONSITE REVIEW

FY 2022 (Q3)

Last: May 20-21, 2019

**Northeast Iowa Community Action Corporation**

NO REVIEW

N/A

N/A

Last: June 23, 2021 (full desk-review completed)

**Operation Threshold**

FULL ONSITE  
ONSITE REVIEW  
FY 2022 (Q4)  
Last: July 24-25, 2019

**IMPACT Community Action Partnership**

FULL ONSITE  
ONSITE REVIEW  
FY 2023 (Q4)  
Last: November 16, 2020 (full desk-review completed)

**South Central Iowa Community Action Program, Inc.**

NO REVIEW  
N/A  
N/A  
Last: August 7-8, 2018    Scheduled: September 13-14, 2021

**Community Action of Southeast Iowa**

FULL ONSITE  
ONSITE REVIEW  
FY 2022 (Q4)  
Last: September 30 - October 1, 2019

**Sieda Community Action**

FULL ONSITE  
ONSITE REVIEW  
FY 2023 (Q3)  
Last: June 10, 2020 (full desk-review completed)

**Upper Des Moines Opportunity, Inc.**

NO REVIEW  
N/A  
N/A  
Last: May 3, 2021 (full desk-review completed)

**West Central Community Action**

FULL ONSITE  
ONSITE REVIEW  
FY 2023 (Q3)  
Last: May 4, 2020 (full desk-review completed)

**Community Action Agency of Siouxland**

FULL ONSITE  
ONSITE REVIEW  
FY 2022 (Q4)  
Last: August 26-27, 2019

<b>1800 CSBG PROGRAM REVIEWS (MONITORING)</b>
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**1801 CSBG ONSITE REVIEWS (MONITORING)**

To determine if CAAs meet the performance goals, administrative standards, service delivery requirements, federal and state regulations, and other requirements established by the DCAA, the DCAA will conduct a CSBG program operations review and a CSBG organizational standards assessment of each CAA at least once during each three (3) year period (see policy #1805).

To determine if CAAs meet the financial management requirements, the IDHR, Central Administration will conduct an annual CSBG fiscal monitoring review (see policy section #1900).

**1802 CSBG PROGRAM OPERATIONS REVIEWS**

CSBG program operations reviews are to determine if the CAAs are meeting the performance goals, administrative standards, service delivery requirements, and other requirements established by the State of Iowa and the DCAA. Iowa's CSBG State Plan and Application (Section 10: Monitoring, Corrective Action, and Fiscal Controls) includes CSBG program operations review information.

**1803 CSBG ORGANIZATIONAL STANDARDS ASSESSMENTS**

CSBG organizational standards assessments are conducted to ensure CAAs have the appropriate capacity to deliver services to low-income people and communities.

Iowa's CSBG State Plan and Application (Section 6: Organizational Standards for Eligible Entities) establishes Iowa's CSBG organizational standards for CAAs, and Iowa's CSBG State Plan and Application (Section 10: Monitoring, Corrective Action, and Fiscal Controls) includes CSBG organizational standards assessment information.

**1804 GUIDING PRINCIPLES**

The DCAA conducts its CSBG onsite reviews according to the three (3) CSBG Monitoring Standards: mutual respect, open communication, and joint problem solving.

Mutual Respect: In working with CAA staff and CAA governing board members, the DCAA values and recognizes the unique knowledge, ability, and independence of each person. The DCAA is committed to treating all persons fairly and maintaining credibility by matching actions with words.

Open Communication: Effective communication is key in facilitating good working relationships with partners; and the DCAA is committed to keeping the lines of communication open. The purpose of communication is to assist in developing solutions to problems, to share program improvement ideas, and provide information on new developments in the anti-poverty field. The DCAA will communicate frequently through a variety of tools and media. The DCAA is open to contact and is committed to listening to suggestions, concerns, and to gaining an understanding of local operations and to assist locals in pursuing priorities.

Joint Problem Solving: The DCAA operates under the basic belief that a team approach to problem solving is in the best interest of all parties involved. The DCAA believes that collectively the DCAA and the CAA can arrive at the best solution to any situation. The DCAA wants to promote an environment in which the office and all Community Action partners will be open to change and can work together in exploring options and developing mutually agreeable solutions. The goal is to have CAAs function independently with the DCAA's support in an effort to meet the needs of local communities within the parameters set by legislation.

#### 1805 SCHEDULING CSBG ONSITE REVIEWS

CAAs will receive a CSBG onsite review at least once during each three (3) year period. Iowa's CSBG State Plan and Application (Section 10: Monitoring, Corrective Action, and Fiscal Controls (Monitoring of Eligible Entities)) includes the DCAA's CSBG onsite review schedule. The schedule identifies the CAA, review type, target date, and the date of last full CSBG onsite review.

CSBG onsite reviews will generally be conducted during the last six (6) months of the CSBG program year. The DCAA will contact the CAA Executive Director and the CAA CSBG staff to schedule the CSBG onsite review (see policy #1809).

The DCAA will follow the federal guidance on three (3) year CSBG onsite review scheduling provided in OCS, CSBG Information Memorandum, Transmittal #97.

#### 1806 RE-SCHEDULING CSBG ONSITE REVIEWS

CAAs must notify the DCAA, as soon as possible, when a situation occurs that would require a scheduled CSBG onsite review to be postponed or changed. If this occurs, the DCAA will work with the CAA Executive Director and the CAA CSBG staff to reschedule the visit.

When a situation occurs that would require the DCAA to postpone or change a scheduled CSBG onsite review, the DCAA will notify the CAA as soon as possible. The DCAA will work with the CAA Executive Director and the CAA CSBG staff to reschedule the visit.

#### 1807 CSBG PROGRAM OPERATIONS REVIEW INSTRUMENT

During the CSBG onsite review, the DCAA will work with CAA staff to complete the CSBG Program Operations Review instrument (CSBG monitoring instrument). The DCAA's CSBG monitoring instrument, at a minimum, will include questions and procedures for reviewing the following:

- Governing board structure (tripartite and other mechanisms)
- CAA by-laws and board materials
- Board governance
  - Board meeting agendas, minutes, and information
  - Board vacancies and attendance
  - Board orientation information
  - Board manuals
  - Board policies, procedures, and training
- CSBG program and financial reports
- CAA policies, procedures, and operations
- CAA audits, monitoring reports, and program reviews
- ROMA system
  - Community Action National Performance Indicators (NPIs) data review and verification
  - Community Action NPIs targeting and reporting

If requested, the DCAA will provide a copy of the completed CSBG monitoring instrument to the CAA.

Desk-Monitoring (Desk-Reviews):

CAA documents and materials that are (or can be made) readily available to the DCAA, are necessary for completing the CSBG onsite review, and would not require the DCAA to visit the CAA to inspect, may be reviewed at the DCAA office as part of the CAA's CSBG onsite review. It is the DCAA's discretion to select the CAA documents and materials to desk-review.

## 1808 CSBG ORGANIZATIONAL STANDARDS ASSESSMENT INSTRUMENT

During the CSBG onsite review, the DCAA will work with CAA staff to complete the CSBG Organizational Standards Assessment instrument. The DCAA's CSBG Organizational Standards Assessment instrument is designed to assess CAAs against the 58 CSBG organizational standards.

Iowa's CAAs are required to meet the 58 CSBG organizational standards for private, nonprofit CSBG eligible entities (CSBG Contract, Special Terms and Conditions, Article 28.11). The 58 CSBG organizational standards are listed in policy #2301.

Desk-Monitoring (Desk-Reviews):

CAA documents and materials that are (or can be made) readily available to the DCAA, are necessary for completing the CSBG onsite review, and would not require the DCAA to visit the CAA to inspect, may be reviewed at the DCAA office as part of the CAA's CSBG onsite review. It is the DCAA's discretion to select the CAA documents and materials to desk-review.

## 1809 CSBG ONSITE REVIEW PROCEDURES

The following are the DCAA's procedures for conducting CSBG onsite reviews:

1. The DCAA will contact the CAA Executive Director and the CAA CSBG staff to schedule the CSBG onsite review.
2. At least fourteen (14) calendar days prior to the CSBG onsite review, the DCAA will provide the CAA a copy of the CSBG program operations review instrument, a copy of the CSBG organizational standards assessment instrument, a list of data that will be inspected (see policy #2003), and any other information necessary for conducting the review.
3. The DCAA will conduct an exit meeting with the CAA Executive Director, CAA CSBG staff, and/or other appropriate CAA staff once the CSBG onsite review of information has been completed. The DCAA will work with the CAA Executive Director to schedule the exit meeting.
4. CSBG Program Operations Review Report:  
No later than sixty (60) calendar days following the CSBG onsite review exit meeting, the DCAA will complete and send the CAA Executive Director and CAA Board President/Chair a review letter/report. If the DCAA does not identify any deficiencies the review letter/report will complete and close the CSBG program operations review. If the DCAA does identify deficiencies, at a minimum, the review letter/report will:
  - Inform the CAA of the deficiencies
  - Require the CAA to correct the deficiencies
  - Include a due date or timeline for the CAA to correct the deficiencies
  - If appropriate or necessary, the DCAA will offer the CAA training and technical assistance to address the deficiencies, or require the CAA to address the deficiencies with other training and technical assistance

The DCAA will not require training and technical assistance to address the deficiencies if the CAA has the expertise and skills to correct the deficiencies and can correct the deficiencies in a reasonable amount of time.

Corrective Action:

CAAs with deficiencies (that the DCAA has determined do not require training and technical assistance to address) will be given at least sixty (60) calendar days to correct the deficiencies. The CSBG program operations review will not be considered complete until the DCAA determines the CAA's corrective actions have been completed and adequately addressed the deficiencies identified in the review letter/report. Once adequately addressed, the DCAA will complete and send the CAA Executive Director and the CAA Board President/Chair a letter accepting the corrective actions and closing the CSBG program operations review.

CAAs that fail to meet the requirements in the review letter/report will be required to work with the DCAA on a technical assistance plan or be required to develop and implement a quality improvement plan.

Deficiencies corrected by the CAA (and determined by the DCAA to be corrected) prior to the DCAA issuing the review letter/report will be identified in the review letter/report as corrected deficiencies.

Technical Assistance Plan:

CAAs with deficiencies (that the DCAA has determined require training and technical assistance to address) will be required to work with the DCAA on developing a technical assistance plan (TAP) to correct the deficiencies. The DCAA will adhere to the TAP requirements in the CSBG Act (Section 678C) and the federal guidance provided in OCS, CSBG Information Memorandum, Transmittal #116, when developing a TAP with a CAA.

The CSBG program operations review will not be considered complete until the DCAA determines the CAA has met the TAP requirements. Once the TAP requirements are met, the DCAA will complete and send the CAA Executive Director and the CAA Board President/Chair a letter stating that the TAP requirements have been met and the CSBG program operations review is complete.

CAAs that fail to meet the TAP requirements will be required to work with the DCAA on another technical assistance plan or be required to develop and implement a quality improvement plan, and the DCAA may conduct a follow-up CSBG onsite review (see policy #1814).

Quality Improvement Plan:

CAAs with one or more significant deficiencies (as determined by the DCAA) will be required to develop and implement a quality improvement plan (QIP) to correct the deficiencies. The DCAA will adhere to the QIP requirements in the CSBG Act (Section 678C) and the federal guidance provided in OCS, CSBG Information Memorandum, Transmittal #116, when requiring a CAA to develop and implement a QIP.

Iowa's CSBG State Plan and Application (Section 10: Monitoring, Corrective Action, and Fiscal Controls) includes the DCAA's process for reporting QIPs to OCS.

The CSBG program operations review will not be considered complete until the DCAA determines the CAA has met the QIP requirements. Once the QIP requirements are met, the DCAA will complete and send the CAA Executive Director and the CAA Board President/Chair a letter stating that the QIP requirements have been met and the CSBG program operations review is complete.

CAAs that fail to meet the QIP requirements will receive a follow-up CSBG onsite review (see policy #1814).

5. CSBG Organizational Standards Assessment Report:

No later than sixty (60) calendar days following the CSBG onsite review exit meeting, the DCAA will complete and send the CAA Executive Director and CAA Board President/Chair an assessment letter/report and a copy of the completed CSBG Organizational Standards Assessment instrument. If the DCAA does not identify any unmet standards, the assessment letter/report will complete and close the CSBG organizational standards assessment. If the DCAA does identify unmet standards, at a minimum, the assessment letter/report will:

- Inform the CAA of the unmet standards
- Require the CAA to correct the unmet standards
- Include a due date or timeline for the CAA to correct the unmet standards
- If appropriate or necessary, the DCAA will offer the CAA training and technical assistance to address the unmet standards, or require the CAA to address the unmet standards with other training and technical assistance

The DCAA will not require training and technical assistance to address unmet standards if the CAA has the expertise and skills to correct the unmet standards and can correct the unmet standards in a reasonable amount of time.

Corrective Action:

CAAs with unmet standards (that the DCAA has determined do not require training and technical assistance to address) will be given at least sixty (60) calendar days to correct the unmet standards. The CSBG organizational standards assessment will not be considered complete until the DCAA determines the CAA's corrective actions have been completed and adequately addressed the unmet standards identified in the assessment letter/report. Once adequately addressed, the DCAA will complete and send the CAA Executive Director and the CAA Board President/Chair a letter accepting the corrective actions and closing the CSBG organizational standards assessment.

CAAs that fail to meet the requirements in the assessment letter/report will be required to work with the DCAA on a technical assistance plan or be required to develop and implement a quality improvement plan.

Unmet standards corrected by the CAA (and determined by the DCAA to be corrected) prior to the DCAA issuing the assessment letter/report will be identified in the assessment letter/report as corrected standards.

Technical Assistance Plan:

CAAs with unmet standards (that the DCAA has determined require training and technical assistance to address) will be required to work with the DCAA on developing a technical assistance plan (TAP) to correct the unmet standards. The DCAA will adhere to the TAP requirements in the CSBG Act (Section 678C) and the federal guidance provided in OCS, CSBG Information Memorandum, Transmittal #116, when developing a TAP with a CAA.

The CSBG organizational standards assessment will not be considered complete until the DCAA determines the CAA has met the TAP requirements. Once the TAP requirements are met, the DCAA will complete and send the CAA Executive Director and the CAA Board President/Chair a letter stating that the TAP requirements have been met and the CSBG organizational standards assessment is complete.

CAAs that fail to meet the TAP requirements will be required to work with the DCAA on another technical assistance plan or be required to develop and implement a quality improvement plan, and the DCAA may conduct a follow-up CSBG onsite review (see policy #1814).

Quality Improvement Plan:

CAAs with a multiple number of unmet standards that the DCAA determines reflect organizational challenges and risk will be required to develop and implement a quality improvement plan (QIP) to correct the unmet standards. The DCAA will adhere to the QIP requirements in the CSBG Act (Section 678C) and the federal guidance provided in OCS, CSBG Information Memorandum, Transmittal #116, when requiring a CAA to develop and implement a QIP.

Iowa's CSBG State Plan and Application (Section 10: Monitoring, Corrective Action, and Fiscal Controls) includes the DCAA's process for reporting QIPs to OCS.

The CSBG organizational standards assessment will not be considered complete until the DCAA determines the CAA has met the QIP requirements. Once the QIP requirements are met, the DCAA will complete and send the CAA Executive Director and the CAA Board President/Chair a letter stating that the QIP requirements have been met and the CSBG organizational standards assessment is complete.

CAAs that fail to meet the QIP requirements will receive a follow-up CSBG onsite assessment (see policy #1814).

#### 1810 CSBG ORGANIZATIONAL STANDARDS AGENCY SELF-ASSESSMENT INSTRUMENT

The DCAA's CSBG Organizational Standards Agency Self-Assessment instrument is designed for CAAs to assess their agency against the 58 CSBG organizational standards and report the results to the DCAA.

Iowa's CAAs are required to meet the 58 CSBG organizational standards for private, nonprofit CSBG eligible entities (CSBG Contract, Special Terms and Conditions, Article 28.11). The 58 CSBG organizational standards are listed in policy #2301.



## 1811 CSBG ORGANIZATIONAL STANDARDS AGENCY SELF-ASSESSMENT

CAAs that are not scheduled to receive a CSBG onsite review during the CSBG program year are required to complete and submit the CSBG Organizational Standards Agency Self-Assessment instrument. The DCAA will provide the self-assessment instrument, instructions, and guidance to those CAAs (see policy #1810). The DCAA will review and validate, through a desk-review process, each CAA self-assessment.

CAA CSBG Organizational Standards Agency Self-Assessment Due Date:

CSBG organizational standards self-assessments are due on or before the last day of the federal fiscal year.

CSBG Organizational Standards Agency Self-Assessment Report:

No later than sixty (60) calendar days following the receipt of the CAA's CSBG organizational standards agency self-assessment, the DCAA will complete and send the CAA Executive Director an assessment letter/report. If the DCAA does not identify any reporting issues, the assessment letter/report will complete and close the self-assessment process. If the DCAA does identify reporting issues, at a minimum, the assessment letter/report will:

- Inform the CAA of the reporting issues
- Require the CAA to correct the reporting issues
- Include a due date or timeline for the CAA to correct the reporting issues
- If appropriate or necessary, the DCAA will offer the CAA training and technical assistance to address the reporting issues, or require the CAA to address the reporting issues with other training and technical assistance

The DCAA will not require training and technical assistance to address reporting issues if the CAA has the expertise and skills to correct the reporting issues and can correct the reporting issues in a reasonable amount of time.

Corrective Action:

CAAs with reporting issues (that the DCAA has determined do not require training and technical assistance to address) will be given at least sixty (60) calendar days to correct the reporting issues. The self-assessment will not be considered complete until the DCAA determines the CAA's corrective actions have been completed and adequately addressed the reporting issues identified in the assessment letter/report. Once adequately addressed, the DCAA will complete and send the CAA Executive Director a letter accepting the corrective actions and closing the self-assessment.

CAAs that fail to meet the requirements in the assessment letter/report will be required to work with the DCAA on a technical assistance plan or be required to develop and implement a quality improvement plan.

Technical Assistance Plan:

CAAs with reporting issues (that the DCAA has determined require training and technical assistance to address) will be required to work with the DCAA on developing a technical assistance plan (TAP) to correct the reporting issues. The DCAA will adhere to the TAP requirements in the CSBG Act (Section 678C) and the federal guidance provided in OCS, CSBG Information Memorandum, Transmittal #116, when developing a TAP with a CAA.

The self-assessment will not be considered complete until the DCAA determines the CAA has met the TAP requirements. Once the TAP requirements are met, the DCAA will complete and send the CAA Executive Director and the CAA Board President/Chair a letter stating that the TAP requirements have been met and the self-assessment is complete.

CAAs that fail to meet the TAP requirements will be required to work with the DCAA on another technical assistance plan or be required to develop and implement a quality improvement plan, and the DCAA may conduct a follow-up CSBG onsite review (see policy #1814).

Quality Improvement Plan:

CAAs with significant reporting issues will be required to develop and implement a quality improvement plan (QIP) to correct the reporting issues. The DCAA will adhere to the QIP requirements in the CSBG Act (Section 678C) and the federal guidance provided in OCS, CSBG Information Memorandum, Transmittal #116, when requiring a CAA to develop and implement a QIP.

Iowa's CSBG State Plan and Application (Section 10: Monitoring, Corrective Action, and Fiscal Controls) includes the DCAA's process for reporting QIPs to OCS.

The self-assessment will not be considered complete until the DCAA determines the CAA has met the QIP requirements. Once the QIP requirements are met, the DCAA will complete and send the CAA Executive Director and the CAA Board President/Chair a letter stating that the QIP requirements have been met and the self-assessment is complete.

CAAs that fail to meet the QIP requirements will receive a follow-up CSBG onsite review (see policy #1814).

1812 GOVERNING BOARD MEETING OBSERVATIONS AND REVIEWS

The DCAA may conduct CAA governing board meeting observations and reviews. The DCAA will contact the CAA Executive Director and the CAA CSBG staff to schedule a board meeting observation.

The DCAA will complete the Board Meeting Observation Assessment form after conducting board meeting observation. If requested, the DCAA will provide a copy of the completed form to the CAA.

1813 NEW ENTITIES (CSBG ONSITE REVIEWS)

The DCAA will conduct a CSBG onsite review for each newly designated entity within 180 calendar days after the completion of the first year in which such entity receives funds through Iowa's CSBG program. The CSBG onsite review will include a CSBG program operations review, a CSBG organizational standards assessment, a CSBG fiscal monitoring review, and at least one observation and review of the new entity's governing board.

1814 FOLLOW-UP CSBG ONSITE REVIEWS

The DCAA will conduct follow-up CSBG onsite reviews, including prompt visits to CAAs that fail to meet the performance goals, administrative standards, service delivery requirements, financial management requirements, or other requirements established by the State of Iowa and the DCAA. The follow-up CSBG onsite reviews may include CSBG program operations reviews, CSBG organizational standards assessments, CSBG fiscal monitoring reviews, and/or at least one observation and review of the CAA's governing board.

If the DCAA decides to conduct a follow-up CSBG onsite review, the CAA will be notified of the follow-up CSBG onsite review at least seven (7) calendar days prior to the onsite.

1815 ADDITIONAL ONSITE REVIEWS

The DCAA will review CAAs onsite, as appropriate, that have federal, state, or local grants that are terminated for cause (CSBG Act, Section 678B(4)). The onsite review will be conducted within 180 calendar days of the DCAA being notified of the grant termination. The CSBG Contract (Special Terms and Conditions, Article 28.13) includes the CAA's requirements for notifying the DCAA when a grant is terminated for cause.

1816 DATA REVIEW AND VERIFICATION

See policy #2003.

1817 RISK ASSESSMENTS

See policy #2204.

<b>1900 FISCAL MONITORING</b>
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**1901 CSBG FISCAL MONITORING REVIEWS (ONSITE)**

Iowa's CSBG State Plan and Application (Section 10: Monitoring, Corrective Action, and Fiscal Controls (Fiscal Controls and Audits and Cooperation Assurance)) addresses CSBG fiscal monitoring reviews.

The IDHR, Central Administration is responsible for conducting annual CSBG fiscal monitoring reviews. The IDHR, Central Administration accountants will review the CAA's financial management and operations to assure the CAA is in compliance with federal and state regulations and DCAA fiscal requirements. The accountants will also provide technical assistance as necessary. The CSBG fiscal monitoring review procedures will be developed and administered by the IDHR, Central Administration.

For each CSBG fiscal monitoring review, the IDHR, Central Administration will inform the DCAA of any CAA findings. Corrective action requirements will be administered by the IDHR, Central Administration and the DCAA.

**1902 AUDITS**

The CSBG Contract (Special Terms and Conditions, Article 20.0) provides CAA annual audit requirements, and Iowa's CSBG State Plan and Application (Section 10: Monitoring, Corrective Action, and Fiscal Controls (Fiscal Controls and Audits and Cooperation Assurance)) includes the IDHR, Central Administration's CAA annual audit review procedures.

See policies #1713, #1714, and #1715 for additional information regarding CAA annual audits.

**1903 RISK ASSESSMENTS**

See policy #2204.