
Iowa Community Services Block Grant

POLICIES AND PROCEDURES MANUAL

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**IOWA COMMUNITY SERVICES BLOCK GRANT
POLICIES AND PROCEDURES MANUAL**

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1000 IOWA CSBG POLICIES AND PROCEDURES MANUAL

1001 INTRODUCTION

The following Community Services Block Grant (CSBG) program policies and procedures have been developed to:

1. Assist Iowa's community action agencies in implementing the CSBG program; and
2. Supplement Iowa's CSBG State Plan and Application, CSBG Contract, Federal and State laws and regulations, Federal and State guidance, Office of Management and Budget Circular requirements, and the Division of Community Action Agencies directives.

Iowa's CSBG State Plan and Application, CSBG Contract, Federal and State laws and regulations, Federal and State guidance, and OMB Circular requirements, will take precedence over these policies and procedures to the extent there are inconsistencies.

1002 ACRONYMS

CSBG -- Community Services Block Grant
 CAA -- Community Action Agency
 DCAA -- Division of Community Action Agencies
 HHS -- U.S. Department of Health and Human Services
 IDHR -- Iowa Department of Human Rights
 LIHEAP -- Low-Income Home Energy Assistance Program
 OCS -- Office of Community Services
 OMB -- Office of Management and Budget

For the public CAA serving the city of Des Moines: "CAA Executive Director" means City Manager and "CAA Board Chairperson" means Mayor.

1003 CSBG PURPOSE

The purpose of the CSBG Act is to provide assistance to States and local communities, working through a network of community action agencies and other neighborhood-based organizations, for the reduction of poverty, the revitalization of low-income communities, and the empowerment of low-income families and individuals in rural and urban areas to become fully self-sufficient.

The purpose of the Iowa CSBG program is to support CAA and other community based organizations efforts to assist low-income families and individuals with basic energy, food, shelter needs, and in working towards achieving self-sufficiency.

1004 POLICY AND PROCEDURE REVISIONS

The DCAA will be responsible for periodically reviewing and revising the policies and procedures in this manual. Revisions will be communicated to the CAAs prior to implementation; and a revised manual will be e-mailed to each CAA Executive Director and CAA Planner with a summary of the changes.

1100 ELIGIBLE ENTITIES**1101 IOWA ELIGIBLE ENTITIES**

Iowa's eighteen (18) CAAs are authorized, by Iowa law (Iowa Code, Chapter 216A, Subchapter 6), to receive Iowa CSBG funding.

1102 DESIGNATION AND REDESIGNATION

The DCAA will follow the requirements of the CSBG Act (Section 676A), Iowa Code (216A.93), and Iowa Administrative Code (427-22.11 and 22.12) for designating and redesignating eligible entities.

The DCAA will also use the Federal guidance provided in HHS Information Memorandum, Transmittal #42 for designating and redesignating eligible entities.

1200 GOVERNING BOARDS

1201 STRUCTURE

CAAs are required to meet the tripartite governing board structure requirements in Iowa Code (216A.94 and 216A.95) and Iowa Administrative Code (427-22.4(3)). These requirements are consistent with the CSBG Act (Section 676B) tripartite governing board requirements.

Tripartite Governing Board Composition:

Low-Income Individuals and Families:

For private nonprofit entities, a minimum of one-third of tripartite board membership must be democratically selected representatives of low-income individuals and families who reside in the geographic area being served by the agency.

For public organizations, such as city, county, or town governments, the law also requires that a minimum of one-third of tripartite board membership be comprised of representatives of low-income individuals and families who reside in areas served. The statute allows public organizations to utilize State-specified mechanisms other than tripartite boards that "assure decision-making and participation by low-income individuals in the development, planning, implementation, and evaluation of programs..."

OCS does not recommend including in this community representation category for either public or private agency boards individuals who provide services or supports to low-income residents but who are neither low-income or residents of the agency's service area. Such individuals may qualify for board membership as representatives of another board category—"major groups or interests in the community."

Elected Officials or their Representatives:

One-third must be elected officials, holding office at their time of selection, or their representatives. If a sufficient number of elected officials or their representatives are not available to serve, appointive public officials or their representatives may take the place of elected officials.

Major Groups and Interests in the Community Served:

The remaining board members must be chosen from "business, industry, and labor, religious, law enforcement, education, or other major groups and interests in the community served."

By Iowa law (Iowa Code, Chapter 216A.94), CAAs must have a tripartite governing board structure consisting of at least nine (9) members.

Iowa's CSBG State Plan and Application (V. Narrative State Plan, F. State Community Services Program Implementation, (3) Tripartite Boards) addresses how the DCAA will ensure CAAs meet the Federal and State tripartite governing board structure requirements.

Other Board Structures (Mechanisms):

Public organizations may submit a request to use another mechanism for administering the CSBG program (CSBG Act, Section 676B(b)(2)). The requested mechanism must ensure decision making and participation by low-income individuals in the development, planning implementation, and evaluation of programs funded under the CSBG Act; and meet the requirements in the Iowa Code (216A.94). Public CAAs interested in using another mechanism for administering their CSBG program must contact the DCAA for request and submittal instructions.

Federal guidance for CAA governing board composition is provided in HHS Information Memorandum, Transmittal #82.

CAAs that administer Head Start programs may be required to meet additional governing board member structure requirements. CAAs will be responsible ensuring any additional Head Start governing board member structure requirements are met.

1202 PARTICIPATION REQUIREMENTS

The CSBG Act (Section 676B) and Iowa law (Iowa Code, Chapter 216A.95) require CAA governing boards to fully participate in the development, planning, implementation, and evaluation of the CSBG program to serve communities.

Federal guidance for CAA governing board requirements is provided in HHS Information Memorandum, Transmittal #82.

1203 DUTIES AND LEGAL RESPONSIBILITIES

CAA governing board members are required to receive training and education relating to the duties and legal responsibilities of the CAA's governing board (CSBG Contract, General Terms, R. #2). The CAA is responsible for having this information available for inspection.

1204 CODE OF CONDUCT (CODE OF ETHICS)

CAA governing boards are required to have adopted ethical and professional standards of operation, and have information and training concerning the implementation of these standards (CSBG Contract, General Terms, R. #3). The CAA is responsible for having this information available for inspection.

Professional standards of operation must include:

- A nepotism policy for disclosure of familiar relationships between employees and members of the governing board
- Policies regarding conflict of interest
- Standards of responsibility and obedience to law, fairness, and honesty

1205 EMPLOYEE PERFORMANCE REVIEWS AND COMPENSATION

CAA governing boards are required to review the performance of management employees and establish the compensation of those employees (CSBG Contract, General Terms, R. #3); and must have procedures for conducting the reviews. The CAA is responsible for having this information available for inspection.

1206 ACCOUNTING INTERNAL CONTROLS REVIEWS

CAA governing boards are required to review the CAA's internal controls of the CAA's accounting processes and procedures (CSBG Contract, General Terms, R. #3); and must have procedures for conducting the review. The CAA is responsible for having this information available for inspection.

Internal controls are agency processes for ensuring reliable financial reporting, effective and efficient operations, compliance with applicable laws and regulations, and safeguards against theft and unauthorized use, acquisition, or disposal of agency assets.

1207 OPERATION COMPLIANCE REVIEWS

CAA governing boards are required to review the CAA's compliance with the laws, rules, regulations, and contractual agreements applicable to the CAA's operations (CSBG Contract, General Terms, R. #3); and must have procedures for conducting the review. The CAA is responsible for having this information available for inspection.

1208 PETITION FOR REPRESENTATION

CAAs are required to have established 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 governing board (or other mechanism) of the CAA to petition for adequate representation (CSBG Act, Section 676(b)(10)).

Iowa's CSBG State Plan and Application (V. Narrative State Plan, G. Fiscal Controls and Monitoring, (3) Fiscal Controls, Audits, and Withholding, (c) Assurance 676(b)(10)) addresses how the DCAA will ensure CAAs have established, and are implementing, the petition for representation requirements.

1209 DEMOCRATIC SELECTION PROCEDURES FOR VACANT LOW-INCOME SECTOR SEATS

CAAs are required to fill vacant low-income sector governing board member seats through democratic selection procedures adequate to assure that these members are representative of low-income families and individuals in the neighborhoods served (CSBG Act, Section 676B).

CAAs must have established democratic selection procedures for filling vacant low-income sector governing board member seats; and must maintain the procedure documentation for seating these members.

Federal guidance for CAAs filling vacant low-income sector governing board member seats through democratic selection procedures is provided in HHS Information Memorandum, Transmittal #82.

Iowa's CSBG State Plan and Application (V. Narrative State Plan, F. State Community Services Program Implementation, (3) Tripartite Boards) addresses how the DCAA will ensure CAAs meet the Federal requirements for filling vacant low-income sector governing board member seats.

1210 LOW-INCOME SECTOR SEAT RESIDENCE

CAAs are required to ensure their low-income sector governing board members meet the residency requirements in the CSBG Act (Section 676B) and HHS Information Memorandum, Transmittal #82.

1300 FUNDING

1301 RECEIPT OF FEDERAL FUNDS (OCS GRANT AWARD LETTERS)

CAA CSBG funding is subject to the DCAA's receipt of grant award letters from the OCS. The DCAA will provide the CAAs with a written notification when CSBG program funds are available.

The CSBG Contract (Special Terms and Conditions, Articles 14.4 and 15.0) addresses how the DCAA will administer the receipt of CSBG program funds from OCS.

1302 ALLOCATION DISTRIBUTION AND CRITERIA

The DCAA allocates CSBG program funds to the CAAs according to the allocation criteria defined in the CSBG Allocation Formula document. Iowa's CSBG State Plan and Application (V. Narrative State Plan, A. Administrative Structure, (3) Distribution and Allocation of Funds, (a) Planned Distribution of Funds for Current Fiscal Year; and V. Narrative State Plan, B. Description of Criteria and Distribution Formula, Criteria and Distribution Formula) addresses how the DCAA will distribute CSBG program funds to the CAAs and the DCAA; it also provides information on Iowa's CSBG allocation criteria.

Allocation Criteria Changes:

Iowa's CSBG allocation criteria will be reviewed and evaluated when new decennial census data is available. The review and evaluation will be conducted by a committee of DCAA staff, Commissioners from the Iowa Commission on Community Action Agencies, and CAA Executive Directors.

At a minimum, the allocation criteria will be updated to include the new decennial census data. If the committee determines additional allocation criteria changes may be necessary, the committee will be responsible for creating and proposing new allocation criteria for the Iowa Commission on Community Action Agencies to review and act on.

The DCAA will be responsible for informing the committee and Iowa Commission on Community Action Agencies of current CSBG funding allocation laws, regulations, and requirements.

1303 TERMINATION AND REDUCTION

Iowa's CSBG State Plan and Application (V. Narrative State Plan, G. Fiscal Controls and Monitoring, (2) Corrective Action, Termination, and Reduction of Funding) addresses how the DCAA will administer termination and reduction of CSBG funding to noncompliant CAAs.

The DCAA will also use the Federal guidance on corrective action, and termination or reduction of CSBG funding, provided in HHS Information Memorandum, Transmittal #116.

1304 CARRY-OVER BALANCES

CAAs have two (2) years to expend the program funds in their CSBG Contract. Iowa's CSBG State Plan and Application (V. Narrative State Plan, B. Description of Criteria and Distribution Formula, Carry-over Balances) and CSBG Contract (Special Terms and Conditions, Article 14.2) explain and provide procedures that allow for the CAAs to carry-over CSBG program funds.

1305 NON-EXPENDED FUNDS

Iowa's CSBG State Plan and Application (V. Narrative State Plan, B. Description of Criteria and Distribution Formula, Carry-over Balances) and CSBG Contract (Special Terms and Conditions, Article 14.2) explain and provide procedures for returning unexpended CAA and DCAA CSBG program funds.

1306 DISCRETIONARY FUNDING

Iowa law does not allow for using CSBG program funds for discretionary activities.

1307 MAINTAINING FUNDING LEVELS

Iowa's CSBG State Plan and Application (V. Narrative State Plan, G. Fiscal Controls and Monitoring, (3) Fiscal Controls, Audits, and Withholding, (b) Assurance 676(b)(8)) addresses how the DCAA will allocate and ensure that each CAA will receive their proportional share of CSBG program funds each year.

1400 PLANNING (CSBG COMMUNITY ACTION PLAN AND APPLICATION)

For this section (1400), "application" means CSBG Community Action Plan and Application.

1401 APPLICATION

CAAs must complete and submit an application each year. CAA application requirements are addressed in the CSBG Act (Section 676(b)(11)), Iowa law (Iowa Administrative Code: 427-22.5), the CSBG Contract (Article 3.0), and throughout Iowa's CSBG State Plan and Application.

1402 APPLICATION INSTRUCTIONS AND FORMS

Each year, the DCAA will provide instructions, forms, and guidance to the CAAs for preparing their annual application. The instructions, forms, and guidance will address the requirements from the documents listed in section 1401, and the requirements provided in section 1403.

Application Issue Date:

The DCAA will issue the application instructions and forms in February of each year.

Application Due Date:

The application will be due in June of each year.

In FY 2004, the DCAA adopted an application process under which a "FULL" application is required from the CAAs for even numbered Federal fiscal year CSBG funding, and an "ABBREVIATED" application for odd numbered Federal fiscal year CSBG funding.

1403 APPLICATION REQUIREMENTS

Annual CAA applications shall include, at a minimum, the following required information:

Planning Process:

CAAs are required to include a narrative that describes how their agency planned and developed their application. The narrative must include the following:

- A description of how the CAA's CSBG program funds will be used to support the activities addressed in the CSBG Act (Section 676(b)(1)(A))
- A description of the formal planning process used to develop the application, including information about the governing board's participation and involvement in the planning process
- A description and information about the statewide needs assessments used in planning process

CAAs are also required to include supporting documentation that verifies the governing board's full participation in the planning process, and that the governing board reviewed and approved the application before submittal.

*Agency Program Implementation:

CAAs are required to explain how their agency carries out the following program implementation assurances:

- Service Delivery System (CSBG Act, Section 676(b)(3)(A))
- Linkages (CSBG Act, Section 676(b)(3)(B))
- Coordination with other Public and Private Resources (CSBG Act, Section 676(b)(3)(C))
- Innovative Community and Neighborhood-based Initiatives (CSBG Act, Section 676(b)(3)(D))

CAAs are required to explain how their agency will ensure that its CSBG program funds will be used to address the following programmatic assurances:

- Youth Development Programs (CSBG Act, Section 676(b)(1)(B))
- Nutrition (CSBG Act, Section 676(b)(4))
- Government and Social Service Program Linkages (CSBG Act, Section 676(b)(5))
- Emergency Energy Crisis Intervention Programs (CSBG Act, Section 676(b)(6))
- Partnerships (CSBG Act, Section 676(b)(9))

Financial Information:

CAAs are required to complete and submit the following forms (provided by the DCAA):

- Budget Summary
- Program Financial Summary
- Financial Systems Survey

Other Required Information:

CAAs are required to complete and submit the following forms (provided by the DCAA) and/or include:

- Certification of Federal and State Assurances
- List of Governing Board Members
- Indirect Cost Letter (if applicable)
- CSBG National Performance Indicators and Targets

*ABBREVIATED applications will not include the Agency Program Implementation section requirements.

1404 GOVERNING BOARD APPLICATION REVIEW AND APPROVAL

The CAA's governing board must fully participate in the planning and development of the CAA's application. Once the application is complete, it must be reviewed and approved by the governing board. The CAA is responsible for having this information available for inspection.

1405 DCAA APPLICATION REVIEW AND APPROVAL

The DCAA and IDHR Central Administration are responsible for reviewing, evaluating, and approving each CAA application.

At a minimum, each CAA application will be reviewed and evaluated to ensure it meets the requirements presented in the application instructions; and a review sheet will be completed. Applications that meet the application requirements will be approved by the DCAA and IDHR Central Administration. Once approved, the DCAA will send the CAA an approval letter and issue a CSBG Contract.

CAAs will be contacted by the DCAA if the DCAA and/or IDHR Central Administration have determined through the review and evaluation process that their application does not meet the application requirements. CAAs will be required to address the DCAA's and/or IDHR Central Administration's questions and/or issues. Once the CAA response is received, and the DCAA and IDHR Central Administration review and approve the response, the DCAA will send the CAA an approval letter and issue a CSBG Contract.

The DCAA and IDHR Central Administration will conduct their reviews and evaluations to ensure each CAA's application is approved and a CSBG Contract issued before the CAA's previous year's CSBG Contract expires.

1406 ASSURANCES

As part of the application process, CAA Executive Directors and CAA Board Chairpersons will be required to review, agree to, and certify, a list of Federal and State assurances. At a minimum, the assurances will include the Federal assurances in the CSBG Act.

1407 ALLOWABLE CSBG FUNDED ACTIVITIES

CAAs are required to assure and use their CSBG program funds for programs, services, activities, and initiatives that are consistent with the requirements of the CSBG Act (Section 676(b)). Iowa's CSBG State Plan and Application (V. Narrative State Plan, F. State Community Services Program Implementation, (5) Programmatic Assurances) addresses how the DCAA will ensure the CAAs are using their CSBG program funds appropriately.

1408 COMMUNITY NEEDS ASSESSMENTS

Iowa's CSBG State Plan and Application (V. Narrative State Plan, F. State Community Services Program Implementation, (2) Community Needs Assessments) explains how the CAAs and DCAA will address the CSBG community needs assessment requirements in the CSBG Act (Section 676(b)(11)).

Needs Assessment Committee:

The DCAA's Needs Assessment Committee is a planning committee made up of DCAA staff and CAA Planners. The committee is responsible for planning and conducting statewide CAA needs assessments. Results from the needs assessments are used by Iowa's CAAs for planning, developing, and delivering agency activities, services, and initiatives.

1409 STRATEGIC PLANNING

The DCAA strongly encourages each CAA to have an agency strategic planning document. At a minimum, a CAA strategic planning document should include five (5) basic components:

- Purpose (mission Statement)
- Goals for accomplishing the mission
- Approaches or strategies to reach the goals
- Action steps to implement each approach or strategy
- Procedures for monitoring and updating the plan

1500 POLICIES

1501 CHARITY TAX CREDIT PROGRAM

The State Charity Tax Program is not applicable to the State of Iowa.

1502 CHILD SUPPORT SERVICES

CAAs are required (CSBG Act, Section 678G(b)) to inform custodial parents in single-parent families that participate in agency programs, activities, or services, about the availability of child support services, and refer eligible parents to the child support offices of State and local governments.

CAAs must have policies and procedures addressing this requirement, and/or guidance that informs and educates CAA staff about this requirement. CAAs must also establish a referral system with the State and local child support offices.

1503 CLIENT APPEAL AND HEARING PROCEDURES

CAAs are required to have client appeal and hearing procedures that meet or exceed the requirements in the CSBG Contract (Special Terms and Conditions, Article 24.0).

1504 CLIENT CONFIDENTIALITY

The CSBG Contract (Special Terms and Conditions, Article 23.0) includes CAA client confidentiality policy requirements.

1505 CLIENT INCOME ELIGIBILITY AND VERIFICATION

CAAs are required to use 125% of the OMB Federal poverty level as the ceiling for determining client (household and individual) income eligibility for services provided with CSBG program funds.

CAAs providing CSBG funded services to clients are required to verify and document proof of income eligibility. CAAs are required to use Iowa's LIHEAP household income and exempt income definitions for determining a client's income eligibility. This information is in the Income and Exempt Income sections of the State of Iowa--LIHEAP Procedures Manual.

1506 CLIENTS SERVED BY CAA CSBG CO-FUNDED SERVICES

CAAs that use CSBG program funds to co-fund other agency services are required to ensure a pro rata share of clients (at or below the 125% OMB Federal poverty level) receiving the service must be equivalent to, or greater than, the percentage of CSBG funds co-funding the service.

1507 CONFLICT OF INTEREST

CAAs are required to have conflict of interest policies that meet or exceed the requirements in the CSBG Contract (Special Terms and Conditions, Articles 11.0 and 12.0; General Terms, L. #33 and R. #3).

1508 CONSTRUCTION OF FACILITIES

CSBG program funds may not be used for the construction of facilities. The CSBG Contract (Special Terms and Conditions, Article 19.0) includes CSBG activities that are ineligible for CSBG funding.

Waiver Request:

In cases of extraordinary circumstances, CAAs may request to waive the construction of facilities limitation (CSBG Act, Section 678F(a)). CAA waiver requests must be submitted to the DCAA, and address the waiver application requirements in HHS Information Memorandum, Transmittal #60. As addressed in the memorandum, the DCAA will be responsible for submitting the request to HHS. CAAs interested in obtaining a construction of facilities waiver must contact the DCAA for request and submittal instructions.

1509 DEBARMENT AND SUSPENSION

A CAA will not be allowed to participate in the CSBG program in any capacity, and will not receive any CSBG program funding if the CAA has been debarred, suspended, or otherwise found to be ineligible for participation in Federal assistance programs. The CSBG Contract (Special Terms and Conditions, Article 28.5; General Terms, O.) includes debarment and suspension terms and conditions.

At the beginning of each CSBG program year, the DCAA will ensure (by consulting the ineligible parties list) that all Iowa CAAs are eligible for Federal assistance programs. CAAs ineligible for Federal assistance programs will not receive a CSBG Contract.

1510 DRUG FREE WORKPLACE

The CSBG Contract (General Terms, Q.) includes CAA drug free workplace requirements.

1511 EQUIPMENT PURCHASING, LEASING, DISPOSING, AND INVENTORY

The CSBG Contract (General Terms, U.) includes CAA equipment purchasing, leasing, disposing, and inventory requirements.

CAAs must receive prior approval from the DCAA when purchasing/leasing any equipment that involves \$5,000 or more of CSBG program funds. To request a DCAA approval review for an equipment purchase, CAAs must complete and submit the [CSBG Equipment and Vehicle Purchase/Lease Request Form](#). The DCAA will respond to the request within fourteen (14) calendar days of the DCAA's receipt of the request.

Purchasing American Made Equipment:

The CSBG Contract (Special Terms and Conditions, Article 28.3) includes CAA requirements for purchasing American made equipment and products.

1512 FEDERAL INVESTIGATIONS

Iowa's CSBG State Plan and Application (V. Narrative State Plan, G. Fiscal Controls and Monitoring, (3) Fiscal Controls, Audits, and Withholding, (a) Assurance 676(b)(7)) addresses how the DCAA will assure permission and cooperation in the event of a Federal investigation concerning Iowa's use of CSBG program funds.

1513 HEALTHY MARRIAGE INITIATIVES

CSBG program funds may be used by CAAs for planning, coordinating, integrating, strengthening, and expanding public and private assistance related to the activities known as the Healthy Marriage Initiative (HHS Information Memorandum, Transmittal #89).

1514 INSURANCE

The CSBG Contract (General Terms, G.) includes CAA insurance requirements.

Self-Insured CAAs:

The CSBG Contract (Special Terms and Conditions, Article 27.0) includes insurance requirements for CAAs that are self-insured.

1515 LIMITED ENGLISH PROFICIENCY (TRANSLATION AND INTERPRETATION SERVICES)

CAAs are required and have a legal obligation to provide oral and written language assistance to limited English proficiency persons receiving (or potentially receiving) CAA services. CAAs must have policies and procedures that address this requirement.

Federal guidance on serving persons with limited English proficiency is provided in HHS Information Memorandum, Transmittal #50.

1516 LIVING WAGE (HOUSEHOLD) AND LIVING WAGE JOB DEFINITIONS

The DCAA defines, for CSBG program purposes, a household's "living wage" as a household above 200% of the OMB Federal poverty level; and defines a "living wage job" as a job that pays above 200% of the OMB Federal poverty level for a one (1) person household.

1517 LOBBYING ACTIVITIES

Lobbying activities ineligible for CSBG funding are included in the CSBG Contract (Special Terms and Conditions, Article 28.2). Additional lobbying terms and conditions are addressed in the CSBG Contract (General Terms, P.).

1518 MEMBERSHIPS, SUBSCRIPTIONS, AND PROFESSIONAL ACTIVITIES

The CSBG Contract (Special Terms and Conditions, Article 28.6) includes CAA requirements for using CSBG program funds to pay for memberships, subscriptions, and professional activities.

For membership costs in a civic or community organization that require a DCAA approval review, CAAs must complete and submit the CSBG Request for Membership Form. The DCAA will respond to the request within fourteen (14) calendar days of the DCAA's receipt of the request.

1519 NEPOTISM

CAAs are required to have a nepotism policy. The policy must include procedures for the disclosure of familiar relationships among employees and between employees and members of the governing board; and it must also meet or exceed the conflict of interest requirements included in the CSBG Contract (Special Terms and Conditions, Articles 11.0 and 12.0; General Terms, L. #33 and R. #3).

1520 NON-DISCRIMINATION (CIVIL RIGHTS REQUIREMENTS)

The CSBG Contract (General Terms, M.) includes CAA civil rights requirements for clients, employees, and applicants for CAA employment.

1521 NON-DOCUMENTED CITIZENS

As directed in DCAA Information Memorandum Transmittal 5.0, CAAs are allowed to use CSBG program funds to serve non-citizens, regardless of their alien status.

Federal guidance for using CSBG program funds to serve non-citizens is provided in HHS Information Memorandum, Transmittal #30.

- 1522 POLITICAL ACTIVITIES
Political activities ineligible for CSBG funding are included in the CSBG Contract (Special Terms and Conditions, Article 19.0).
- 1523 RELIGIOUS ACTIVITIES
The CSBG Contract (Special Terms and Conditions, Article 28.1) includes CAA provisions for using CSBG program funds for religious activities.
- 1524 RETENTION OF RECORDS
The CSBG Contract (Special Terms and Conditions, Article 16.3) includes CAA requirements for retaining CSBG program records.
- 1525 RISK ASSESSMENTS
As part of the DCAA's review, evaluation, and approval of the CAA's CSBG Community Action Plan and Applications (application), risk assessments will be conducted. The risk assessments will include a review of the CAAs application submission, monitoring reports, program reports, financial reports, audits, and other program compliance. Based on the risk assessment review, the DCAA will determine if the CAA is in an at-risk situation. CAAs considered to be in an at-risk situation will be contacted, the risk assessment issues will be presented, and training and technical assistance and/or a corrective action plan will be required.
- 1526 SMOKING (PRO-CHILDREN ACT OF 1994)
The CSBG Contract (General Terms, N.) includes CAA Pro-Children Act compliance requirements.
- 1527 TRAFFICKING VICTIMS PROTECTION ACT (FORCED LABOR)
The CSBG Contract (Special Terms and Conditions, Article 28.4) includes CAA Trafficking Victims Protection Act requirements.
- 1528 VOTER REGISTRATION
Voter registration activities ineligible for CSBG funding are included in the CSBG Contract (Special Terms and Conditions, Article 19.0).

Federal guidance on voter registration activities is provided in HHS Information Memorandum, Transmittal #81.
- 1529 WHISTLEBLOWER
The CSBG Contract (General Terms, R. #4) includes CAA "whistleblower" policy requirements.
- 1530 LAND (PURCHASE OR IMPROVEMENT)
CSBG program funds may not be used to purchase or improve land. The CSBG Contract (Special Terms and Conditions, Article 19.0) includes CSBG activities that are ineligible for CSBG funding.
- 1531 DCAA INFORMATION MEMORANDUMS
As directed in DCAA Information Memorandum Transmittal 1.0, the DCAA will issue Iowa CSBG program guidance through Information Memorandums (IM). The IMs will provide guidance to assist Iowa's CAAs with the implementation of Iowa's CSBG program.

1600 CONTRACTS

1601 CONTRACTS

Annually, the DCAA will issue a CSBG Contract to each CAA. CSBG Contracts will be issued after the CAA's annual CSBG Community Action Plan and Application has been approved by the DCAA and IDHR Central Administration, and the DCAA has determined that the CAA has demonstrated through past performance that it has the programmatic and fiscal capacity to successfully carry out the CSBG program; and the DCAA has determined the CAA to be eligible for Federal assistance programs (section 1509).

CSBG Contracts become effective when the CAA Executive Director, CAA Board Chairperson, and the DCAA Administrator have all signed the contract.

1602 RECEIPT OF FEDERAL FUNDS

Information regarding the receipt of Federal CSBG funding is addressed in section 1301.

1603 CONTRACT PERIOD (START DATE AND END DATE)

CSBG Contracts will have a start date of October 1st and an end date of December 31st of the following year. Contracts will cover fifteen (15) months. The CAA's Executive Director may contact the DCAA and request their agency's CSBG Contract end date be reduced to twelve (12) months.

CAAs are required to expend all of their CSBG program funds from their current CSBG contract prior to expending their CSBG program funds from a subsequent CSBG contract.

1604 AMOUNTS

CSBG Contract amounts are set using the allocation criteria in the CSBG Allocation Formula document.

1605 CARRY-OVER BALANCES

Information regarding carrying over CSBG program funds is addressed in section 1304.

1606 EXTENSIONS

The CSBG Contract (Special Terms and Conditions, Article 14.2) includes CAA contract extension information.

1607 AMENDMENTS

CAAs may request to amend the CSBG Contract's administrative terms, conditions, and project budget.

To request a project budget amendment, the CAA must complete and submit a CSBG Budget Amendment form; and the form must be submitted according to the requirements in the CSBG Contract (Special Terms and Conditions, Article 10.0). Project budget amendment requests must include detailed explanations and reasons for the proposed amendment.

To request an amendment to the administrative terms and/or conditions, the CAA must submit a letter requesting an amendment. The letter must include the administrative terms and/or conditions to be amended, the proposed amendment, and an explanation and reasons for the proposed amendment. The letter must be submitted according to the requirements in the CSBG Contract (Special Terms and Conditions, Article 10.0).

The DCAA will respond to the request within fourteen (14) calendar days of the DCAA's receipt of the request. For approved requests, the DCAA will prepare and provide the CAA with the necessary documents and instructions to execute the amendment.

Amendment requests must be submitted to the DCAA thirty (30) calendar days prior to the end date of the CSBG Contract. Amendment requests submitted within the final 30 calendar days of the CSBG Contract end date may not be accepted.

1700 FISCAL

1701 COST PRINCIPALS (ALLOWABLE COSTS)
The CSBG Contract (Special Terms and Conditions, Article 17.0) includes allowable cost information.

1702 MONTHLY FUNDING REQUEST AND EXPENDITURE REPORT
The DCAA will provide the necessary report forms, instructions, and guidance, for completing and submitting the CSBG Monthly Funding Request and Expenditures Report.

Due Date:

The CSBG Contract (Special Terms and Conditions, Article 8.0) includes CAA due date requirements for submitting a CSBG Monthly Funding Request and Expenditure Report.

1703 FINAL EXPENDITURE REPORT
CAAs are required to submit a CSBG final expenditure report. The CSBG final expenditure report includes final expenditures, and a final request for reimbursement.

Due Date:

The CSBG Contract (Special Terms and Conditions, Article 8.0) includes the CAA due date requirement for submitting the CSBG final expenditure report.

1704 ADVANCES
The CSBG Contract (Special Terms and Conditions, Article 14.4) includes procedures for CAAs interested in requesting a CSBG funding advance.

1705 DCAA EXPENDITURE REPORT REVIEW AND APPROVAL
All CAA CSBG monthly and final expenditure reports will be tracked, reviewed, and approved by DCAA staff. Once approved, the reports will be forwarded to the IDHR Central Administration for payment processing.

Tracking: logging in the date the report was received, ensuring correct CAA signatures, and ensuring the correct number of copies were received

Review: checking computation, checking budget line items, ensuring the request does not exceed drawdown limits, and ensuring the request is feasible

For CSBG monthly and final expenditure reports received by the DCAA, on or before the report due date, the DCAA and IDHR Central Administration will try to ensure the reports will be processed within twenty-one (21) calendar days of the DCAA's receipt of the report.

If a CAA's report does not meet the tracking and review requirements, the DCAA will contact the CAA and request the CAA correct the issues; and payment processing delays may occur.

1706 ADMINISTRATIVE COSTS
CSBG funds may be used by CAAs for agency administrative costs. Federal guidance in HHS Information Memorandum, Transmittal #37, clarifies the definition and allowability of direct CSBG program and administrative costs.

- 1707 **COST ALLOCATION PLANS**
The CSBG Contract (Special Terms and Conditions, Article 17.3) includes inspection, review, and approval requirements for CAAs that possess a cost allocation plan.
- 1708 **INDIRECT COST RATE**
The CSBG Contract (Special Terms and Conditions, Article 17.2) includes information regarding CAA indirect cost rates.
- 1709 **INTEREST EARNED**
The CSBG Contract (Special Terms and Conditions, Article 18.0) includes CAA retention and remittance requirements for interest earned on advances of CSBG program funds.
- 1710 **AMENDMENTS**
Information regarding CSBG project budget amendments is addressed in section 1607.
- 1711 **BUDGET COST CATEGORY (LINE ITEM) DEVIATIONS**
The CSBG Contract (Special Terms and Conditions, Article 14.3) includes information regarding budget cost category deviations.
- 1712 **AUDITS**
All Iowa CAAs must be audited annually using audit policies and procedures conforming to OMB Circular A-133. The CSBG Contract (Special Terms and Conditions, Article 20.0) includes audit report requirements.

Due Date:

The CSBG Contract (Special Terms and Conditions, Article 8.0) includes CAA due date requirements for submitting a final CAA audit report.

All CAA audit reports submitted will be tracked, reviewed, and approved by the IDHR Central Administration according to their processes and procedures. Once an audit report is received, the IDHR Central Administration has six (6) months to complete the review and approval process. Some reviews may continue beyond 6 months depending on the extent of the findings and questionable costs.

CAA audit reports that meet the IDHR Central Administration tracking and review requirements will be approved. Once approved, the DCAA and IDHR Central Administration will prepare and send the CAA an approval letter.

CAAs will be contacted by the IDHR Central Administration if the IDHR Central Administration determines that the audit report does not meet the tracking and review requirements. CAAs will be required to address the IDHR Central Administration's questions and/or issues. Once the CAA response is received, and the IDHR Central Administration reviews and approves the response, the DCAA and IDHR Central Administration will prepare and send the CAA an approval letter.

The IDHR Central Administration will inform the DCAA of any agency CAA audit report findings and/or questionable costs that will require a response from the CAA.

1713 AUDIT EXTENSIONS

CAAs may request an audit report due date extension (CSBG Contract, Article 20.3). To request an extension, the CAA must submit a letter to the DCAA requesting the extension. The DCAA will respond to the request within thirty (30) calendar days of the DCAA's receipt of the request.

Audit report due date extension requests must be submitted to the DCAA fourteen (14) calendar days prior to the CSBG Contract's audit report due date. Requests submitted within the final 14 calendar days of the CSBG Contract's audit report due date may not be accepted.

1714 OTHER AUDITS AND REVIEWS

The CSBG Contract (Special Terms and Conditions, Article 20.6) includes information regarding other CAA audit reports and reviews

1800 PROGRAM MONITORING

1801 ONSITE REVIEWS

Iowa's CSBG State Plan and Application (V. Narrative State Plan, G. Fiscal Controls and Monitoring, (1) State Program Monitoring, (a) Onsite Review) addresses CSBG program operation onsite reviews and assurances.

1802 GUIDING PRINCIPALS

The DCAA conducts its CSBG program operation 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 sincerely believes that collectively the DCAA and the CAA can arrive at the best solution to any situation. Through a team approach to problem solving, the DCAA thinks outside the traditional ways and comes up with the best strategies for program development, conflict resolution, or compliance issues. 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.

1803 ONSITE REVIEW PROCESS

CSBG program operation onsite reviews will cover and address the CAA's CSBG performance goals, administrative standards, and services and activities.

The DCAA will contact the CAA Executive Director and the CAA Planner to schedule the onsite review visit. Once the onsite review visit is scheduled, at least fourteen (14) calendar days prior to the onsite review visit, the DCAA will provide the CAA with a list of items that will be inspected, and a copy of the CSBG Program Operations Onsite Review document (CSBG Monitoring Instrument).

The DCAA will conduct an exit interview with the CAA Executive Director and CAA Planner and/or other appropriate CAA staff once the onsite review is complete.

No later than sixty (60) calendar days following the onsite review visit, the DCAA will complete and send the CAA Executive Director a "draft" review letter. Once the DCAA and CAA Executive Director approve the "draft" review letter, a final review letter will be mailed to the CAA Executive Director and the CAA Board Chairperson. The letter will include a list of items reviewed, corrective action requirements (if necessary), suggestions for agency improvement (if necessary), and agency response timelines (if necessary). The final review letter will complete and close the onsite review if the CAA did not have issues that required corrective action.

CAAs receiving a review letter with issues requiring corrective action will be given be at least forty-five (45) calendar days to provide a corrective action response; the CAA will also be offered training and technical assistance (if necessary).

Onsite review visits will not be considered complete until the CAA's corrective action response adequately addresses the issues the DCAA identified in the review letter. Once adequately addressed, the DCAA will complete and send the CAA Executive Director and the CAA Board Chairperson another review letter closing the onsite review.

CAAs that fail to meet the CSBG program operation onsite review goals, standards, and requirements, may receive a follow-up review. Information regarding follow-up reviews are addressed in section 1809.

Rescheduling:

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

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

- 1804 CSBG PROGRAM OPERATIONS ONSITE REVIEW DOCUMENT (CSBG MONITORING INSTRUMENT)
During the CSBG program operation onsite review, the DCAA will work with CAA staff to complete the CSBG Program Operations Onsite Review document (CSBG Monitoring Instrument).

The CSBG Monitoring Instrument, at a minimum, will include questions and procedures for collecting the necessary information concerning the items listed in Iowa's CSBG State Plan and Application (V. Narrative State Plan, G. Fiscal Controls and Monitoring, (1) State Program Monitoring, (a) Onsite Review). The CSBG Monitoring Instrument will be reviewed periodically and updated as necessary.

If requested, the DCAA will provide a copy of the completed CSBG Monitoring Instrument to the CAA after their scheduled onsite review.

Desk Monitoring:

CAA documents and materials that are, or can be made, readily available to the DCAA, are necessary for completing the CSBG program operation 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 onsite review.

1805 GOVERNING BOARD MEETING OBSERVATIONS

The DCAA may conduct CAA governing board meeting observations. The DCAA will contact the CAA Executive Director and the CAA Planner to schedule a board meeting observation.

The DCAA will complete the Board Meeting Observation Tool and provide a copy, with DCAA comments, to the CAA no later than thirty (30) calendar days following the board meeting.

1806 ONSITE REVIEW SCHEDULE

CAAs will receive a CSBG program operation onsite review at least once every three (3) years. Iowa's CSBG State Plan and Application (Attachment 11) includes a CSBG program operation onsite review schedule. The schedule identifies the CAA and the CSBG program year the review will be conducted.

CSBG program operation onsite reviews will generally be conducted during the last six (6) months of the CSBG program year.

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

1807 CORRECTIVE ACTION, TERMINATION, AND REDUCTION OF FUNDING

Iowa's CSBG State Plan and Application (V. Narrative State Plan, G. Fiscal Controls and Monitoring, (2) Corrective Action, Termination, and Reduction of Funding) addresses how the DCAA will administer corrective action, termination, and reduction of CSBG funding to noncompliant CAAs. The DCAA will also refer to Federal guidance in HHS Information Memorandum, Transmittal #116.

1808 ONSITE REVIEW OF NEW ENTITIES

Iowa's CSBG State Plan and Application (V. Narrative State Plan, G. Fiscal Controls and Monitoring, (b) Onsite Review of Newly Designated Entities) addresses DCAA onsite review assurances for each newly designated entity.

The DCAA will follow the Federal guidance on CSBG program operation onsite review scheduling for new entities (HHS Information Memorandum, Transmittal #97).

1809 FOLLOW-UP REVIEWS

Iowa's CSBG State Plan and Application (V. Narrative State Plan, G. Fiscal Controls and Monitoring, (c) Follow-up Reviews) addresses how the DCAA will ensure follow-up reviews are conducted at CAAs that fail to meet the goals, standards, and requirements established by the State of Iowa and the DCAA.

CAAs requiring a follow-up review will be notified of the onsite follow-up review at least seven (7) calendar days prior to the visit.

1810 ADDITIONAL REVIEWS

Iowa's CSBG State Plan and Application (V. Narrative State Plan, G. Fiscal Controls and Monitoring, (d) Other Reviews) addresses how the DCAA will ensure additional reviews are conducted at CAAs that have other Federal, State, or local grants terminated for cause.

1811 ROMA DATA REVIEW AND VERIFICATION

CAAs are required to assure the data and information submitted in all four (4) CSBG program reports (section 2001) is accurate and complete. The DCAA reviews all the data and information submitted in these reports.

As part of the CAA's CSBG program operation onsite review, the DCAA will inspect and review a sample of the CAA's ROMA data from the previous program year. The CAA must be able to provide supporting documentation verifying the accuracy of the ROMA data that is sampled.

1900 FISCAL MONITORING**1901 ONSITE REVIEWS AND EVALUATIONS**

Iowa's CSBG State Plan and Application (V. Narrative State Plan, G. Fiscal Controls and Monitoring, (1) State Program Monitoring; and V. Narrative State Plan, G. Fiscal Controls and Monitoring, (3) Fiscal Controls, Audits, and Withholding) addresses CSBG fiscal monitoring onsite reviews, evaluations, and assurances.

The IDHR Central Administration is responsible for conducting the CSBG fiscal monitoring onsite reviews.

For each CSBG fiscal monitoring onsite review, the IDHR Central Administration will inform the DCAA of any agency findings and the appropriate corrective action will be administered by the IDHR Central Administration and the DCAA.

1902 AUDITS

Iowa's CSBG State Plan and Application (V. Narrative State Plan, G. Fiscal Controls and Monitoring, (1) State Program Monitoring, (e) Date of the Last Audit Conducted; and V. Narrative State Plan, G. Fiscal Controls and Monitoring, (3) Fiscal Controls, Audits, and Withholding) and the CSBG Contract (Special Terms and Conditions, Article 20.0) provide CAA audit and review requirements.

Additional information regarding CAA audits is addressed in sections 1712, 1713, and 1714.

2000 PROGRAM REPORTING

2001 PROGRAM REPORTING

The DCAA requires the CAAs to complete and submit the following four (4) CSBG program reports each fiscal year:

- CSBG Activity Report (which includes client characteristics)
- CSBG Agency Funding Report
- CSBG Narratives Report
- CSBG National Performance Indicators Report

These 4 reports have been designed to collect all the required CSBG Annual Report information, which includes ROMA System information.

Additional CSBG program reporting may be requested and required by the DCAA to meet all Federal and State CSBG program accountability requirements.

2002 REPORT FORMS AND INSTRUCTIONS

For each of the CSBG program reports listed in section 2001, the DCAA will provide all the necessary report forms, instructions, and guidance.

The following summarizes the information the DCAA collects from each report:

- CSBG Activity Report: CAA programs, services, information and referrals, and client characteristics data
- CSBG Agency Funding Report: CAA contract budgets (Federal, State, local, and private funds), in-kind resources, other funding, and CSBG expenditure data
- CSBG Narratives Report: various narratives addressing CAA management, program accomplishments, program successes, and innovative and creative CAA programs
- CSBG National Performance Indicators Report: CAA program outcomes and results

Results Oriented Management and Accountability (ROMA) System:

Iowa's CSBG State Plan and Application (V. Narrative State Plan, H. Accountability and Reporting Requirements, (1) Results Oriented Management and Accountability) describes Iowa's ROMA System and CAA ROMA participation requirements.

2003 DUE DATES

The CSBG Contract (Special Terms and Conditions, Article 8.0) includes CAA due date requirements for submitting CSBG program reports.

2004 DATA REVIEW AND VERIFICATION

CAAs are required to assure the data and information submitted in all four (4) CSBG program reports (section 2001) is accurate and complete. The DCAA reviews all the data and information submitted in these reports.

CAAs are also required to maintain documentation that can validate the data and information submitted in the CSBG program reports. The DCAA, as part of the CSBG program operation onsite review process, may request to review the CAA's documentation.

Information regarding ROMA data review and verification is addressed in section 1811.

2005 ROMA WORKGROUP

The DCAA's ROMA Workgroup is a planning committee made up of DCAA staff and CAA Planners. The ROMA Workgroup is responsible for assembling Iowa's CSBG National Performance Indicators report forms, instructions, and providing guidance; and ensuring Iowa's ROMA project meets CSBG program accountability requirements.

2100 TRAINING AND TECHNICAL ASSISTANCE**2101 TRAINING AND TECHNICAL ASSISTANCE**

The DCAA is responsible for providing training and technical assistance to CAAs that receive CSBG program funds. CAAs are encouraged to contact the DCAA to request CSBG training and technical assistance. The DCAA will work with the CAAs to ensure their training and technical assistance needs are addressed.

2201 STATE AUDIT

The DCAA Administrator will participate in the entrance and exit interviews with the Office of Auditor of State (AOS) staff regarding the IDHR annual audit. Any findings and/or recommendations identified in the annual audit report related to the DCAA will be referred to the DCAA Administrator for a response. The DCAA staff, in conjunction with the IDHR Central Administration staff, will develop and submit a response including corrective action (if necessary) in accordance with the timelines established by the AOS. Upon acceptance of the response by the AOS, the DCAA Administrator will be responsible for implementing any corrective action.

2202 DCAA FINANCIAL STATUS REPORT (FEDERAL FINANCIAL REPORT SF-425) SUBMISSIONS

The IDHR Central Administration is responsible for completing and submitting the annual Federal Financial Report for Iowa's CSBG program. IDHR Central Administration will complete the required Form SF-425 using CSBG expenditure information from the IDHR Report of Expenditures (ROE) and from Iowa's Integrated Information for Iowa (I/3) system. IDHR Central Administration will submit the information electronically, via the ACF On-Line Data Collection (OLDC) system.

The DCAA staff will provide copies of the annual Notice of Grant Award and the annual ACF CSBG Terms and Conditions to the appropriate IDHR Central Administration staff. The Financial and Program Progress Reporting section of the ACF CSBG Terms and Conditions provides the necessary guidance for submitting the Federal Financial Report, including due dates and electronic filing information.

