

Iowa Community Services Block Grant Program

FFY 2020-2021 COMMUNITY SERVICES BLOCK GRANT STATE PLAN AND APPLICATION

DRAFT

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 Lead Agency, CSBG Authorized Official, CSBG Point of Contact, and Official State Designation Letter

1.1. Provide the following information in relation to the lead agency designated to administer CSBG in the State, as required by Section 676(a) of the CSBG Act. The following information should mirror the information provided on the Application for Federal Assistance, SF-424M.

1.1a. Lead agency

IOWA

1.1b. Cabinet or administrative department of this lead agency

- Community Services Department
- Human Services Department
- Social Services Department
- Governor's Office
- Community Affairs Department
- Other, describe:

DEPARTMENT OF HUMAN RIGHTS

1.1c. Division, bureau, or office of the CSBG authorized official

DIVISION OF COMMUNITY ACTION AGENCIES

1.1d. Authorized official of the lead agency

Instructional note: 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.

WILLIAM BRAND

1.1e. Street address

**IOWA DEPARTMENT OF HUMAN RIGHTS
LUCAS STATE OFFICE BUILDING – 2ND FLOOR**

1.1f. City

DES MOINES

1.1g. State

IOWA

1.1h. Zip

50319

1.1i. Telephone number and extension

515-281-3268

1.1j. Fax number

515-242-6119

1.1k. Email address

Bill.Brand@iowa.gov

1.1l. Lead agency website

<https://humanrights.iowa.gov/dcaa/csbg>

1.2. Provide the following information in relation to the designated State CSBG point of contact.

Instructional Note: The State CSBG point of contact should be the person that will be the main point of contact for CSBG within the State.

1.2a. Agency name

IOWA DEPARTMENT OF HUMAN RIGHTS, DIVISION OF COMMUNITY ACTION AGENCIES

1.2b. Name of the point of contact

WILLIAM BRAND

1.2c. Street address

**CSBG PROGRAM
DIVISION OF COMMUNITY ACTION AGENCIES
IOWA DEPARTMENT OF HUMAN RIGHTS
LUCAS STATE OFFICE BUILDING – 2ND FLOOR**

1.2d. City

DES MOINES

1.2e. State

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1.2f. Zip

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1.2g. Point of contact telephone number

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1.2h. Fax number

515-242-6119

1.2i. Point of contact email address

Bill.Brand@iowa.gov

1.2j. Point of contact agency website

<https://humanrights.iowa.gov/dcaa/csbg>

1.3. **Designation Letter:** Attach the State's official CSBG designation letter. If either the governor or designated agency has changed, update the letter accordingly.

Instructional Note: The letter should be from the chief executive officer of the State and include, at minimum, the designated State CSBG lead agency and title of the authorized official of the lead agency who is to administer the CSBG grant award.

Attached:

CSBG Designation Letter (Attachment A)

SECTION 2
State Legislation and Regulation

2.1. CSBG State Legislation: Does the State have a statute authorizing CSBG? Yes No

2.2. CSBG State Regulation: Does the State have regulations for CSBG? Yes No

2.3. If yes was selected in item 2.1 or 2.2, attach a copy (or copies) of legislation and/or regulations or provide a hyperlink(s), as appropriate.

Attached:

2019 Iowa Code (State legislation) (Attachment B)

2019 Iowa Acts (State legislation) (Attachment C)

Iowa Administrative Code (State regulations) (Attachment D)

2.4. State Authority: Select a response for each question about the State statute and/or regulations authorizing CSBG:

2.4a. Did the State legislature enact authorizing legislation, or amendments to an existing authorizing statute, last year? Yes No

2019 Iowa Acts, House File 756

2.4b. Did the State establish or amend regulations for CSBG last year? Yes No

2.4c. Does the State statutory or regulatory authority designate 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 mission of the Division of Community Action Agencies (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.

These responsibilities are defined in the 2019 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).

Note: This information is associated with State Accountability Measure 1Sa(i) and may pre-populate the State's annual report form.

The Division of Community Action Agencies' (DCAA) FFY 2020 and FFY 2021 CSBG specific goals for DCAA administration of CSBG under this State Plan are:

DISTRIBUTION OF FUNDS

1. The DCAA 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

1. The DCAA 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 DCAA 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 DCAA 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 DCAA 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 DCAA will complete and issue a CSBG organizational standards onsite assessment report within 60 calendar days of an agency's onsite assessment exit meeting date.
6. The DCAA 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.
7. All Iowa community action agency annual audits that require a management decision for audit findings will be issued a DCAA management decision within 180 calendar days of receipt of the annual audit.

COMMUNICATION

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

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

3.3a. Analysis of [Check all that applies]

- 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)
- Other data (describe)
- Eligible entity community needs assessments
- Eligible entity plans
- Other information from eligible entities, e.g., State required reports (describe)

Other information from eligible entities:

FFY 2018 CSBG program data and information (State required reports)

3.3b. Consultation with [Check all that applies]

- Eligible entities (e.g., meetings, conferences, webinars; not including the public hearing)
- State community action association and regional CSBG T & TA providers
- State partners and/or stakeholders (describe)
- National organizations (describe)
- Other (describe)

Other:

The Iowa Commission on Community Action Agencies (the Division of Community Action Agencies' governing board)

3.4. Eligible Entity Involvement

3.4a. Describe the specific steps the State took in developing the State Plan to involve the eligible entities.

Note: This information is associated with State Accountability Measures 1Sa(ii) and may pre-populate the State's annual report form.

The Division of Community Action Agencies (DCAA) included and involved the Iowa Community Action Association (ICAA) and Iowa's community action agencies in the development of this State Plan. The following are the steps the DCAA took to involve ICAA and the agencies:

February 28, 2019: The DCAA Administrator and DCAA CSBG Program Managers attended the Iowa Commission on Community Action Agencies' commission meeting. At that meeting, the timeline for developing and submitting the State Plan was established.

March 4, 2019: A DCAA CSBG Program Manager attended the agencies' ROMA Subgroup webinar meeting. The CSBG Program Manager provided information about the State Plan and reviewed the State Plan development timeline.

April 1, 2019: The DCAA Administrator and a DCAA CSBG Program Manager attended ICAA's Board of Directors' meeting. The CSBG Program Manager provided information about the State Plan, the DCAA's State Plan development process, and distributed and reviewed the State Plan development timeline. The DCAA's State Plan development process included State Plan updates to ICAA and the agencies' Executive Directors, and opportunities for ICAA, the Executive Directors, and ROMA Subgroup members to be involved in the State Plan development.

April 18, 2019: The DCAA CSBG Program Managers attended the agencies' ROMA Subgroup meeting. A CSBG Program Manager provided information about the State Plan, the DCAA's State Plan development process, and distributed and reviewed the State Plan development timeline.

June 6, 2019: The DCAA Administrator and a DCAA CSBG Program Manager attended ICAA's Board of Directors' meeting. The CSBG Program Manager provided a progress update on the development of the State Plan, distributed and reviewed the State Plan development timeline and a two page document that summarizes each section of the State Plan. The DCAA Administrator and CSBG Program Manager also fielded State Plan questions at the meeting.

July 22, 2019: The DCAA distributed, through e-mail, copies of the 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 1, 2019: ICAA's Board of Directors' meeting.

Prior to the DCAA submitting the State Plan to the Office of Community Services, the Iowa Commission on Community Action Agencies will review the State Plan, and act on it during their August 13th meeting.

- 3.4b. Performance Management Adjustment:** How has the State adjusted State Plan development procedures under this State Plan, as compared to past plans, in order 1) to 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.

Note: This information is associated with State Accountability Measures 1Sb(i) and (ii) and may pre-populate the State's annual report form.

On Iowa's 2015 American Customer Satisfaction Index (ACSI) Eligible Entities Satisfaction with the States Survey report, the Division of Community Action Agencies (DCAA) scored a 67 for Development of CSBG State Plan. Within the Development of CSBG State Plan category, the DCAA scored a 60 for Extent of Involvement. ACSI scores of 60-69 are considered average, 70-79 good.

The DCAA met with the Iowa Community Action Association (ICAA) and Iowa's community action agency Executive Directors in February 2017. At that meeting, the group established a FFY 2018-2019 State Plan development timeline that included the DCAA's State Plan development process. The process included State Plan progress updates to ICAA and the agencies' Executive Directors, and opportunities for ICAA, the Executive Directors, and ROMA Subgroup members to be involved and contribute in the development of the State Plan.

In August 2017, the DCAA received its 2017 ACSI report. On this report, the DCAA scored an 85 for Development of CSBG State Plan. Within the Development of CSBG State Plan category, the DCAA scored an 85 for Extent of Involvement and an 82 for Reflects your Input. ACSI scores of 80-89 are considered excellent, 90-100 exceptional.

The DCAA met with ICAA and the Executive Directors in December 2017. At that meeting, Iowa's 2015 and 2017 ACSI reports were reviewed and discussed. From that discussion, the DCAA, ICAA, and the Executive Directors decided not to make an additional changes to the DCAA's State Plan development process. Therefore, for this State Plan, the DCAA used the State Plan development process that was established with ICAA and the Executive Directors in February 2017.

2019 ACSI report information will be included here.

Based on a review of these results, the DCAA will determine if changes to its State Plan development procedures should be made. Any changes the DCAA decides to make will be included here.

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

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), and xx (2019 ACSI). ACSI scores of 80-89 are considered excellent, 90-100 exceptional.

For this performance period, the Division of Community Action Agencies (DCAA) set its target for agency overall satisfaction at 97. The DCAA's target score is a maintenance goal.

2019 ACSI report information will be included here.

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. (See information about the ACSI in the CSBG State Accountability Measures document.)

Note: Item 3.5 is associated with State Accountability Measure 85 and may pre-populate the State's annual report form.

SECTION 4
CSBG Hearing Requirements

- 4.1. Public Inspection:** Describe how the State made this State Plan, or revision(s) to the State Plan, available for public inspection, as required under Section 676(e)(2) of the Act.

Iowa's State Plan public inspection period was from **July 29, 2019 through August 8, 2019**. On July 23, 2019 the Division of Community Action Agencies (DCAA) issued a public inspection and public hearing news release to the news media for statewide distribution. The news release notified interested persons, partners, and stakeholders that copies of the State Plan were available for inspection and comment at the DCAA, the Iowa Community Action Association, and each of Iowa's seventeen community action agencies. Also, during the public inspection period, the DCAA posted the State Plan on its website, and had printed copies and electronic copies available for interested persons, partners, and stakeholders upon request.

Copies of the State Plan were also distributed to the Iowa Commission on Community Action Agencies (the DCAA's governing board) on July 22, 2019. The DCAA reviewed, provided the comments collected from the public inspection period and public hearing, and discussed the State Plan with commission members during their **August 13, 2019** meeting. The commission acted on the State Plan during their **August 13, 2019** 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 9, 2019**. On July 23, 2019 the Division of Community Action Agencies (DCAA) issued a public inspection and public hearing news release to the news media for statewide distribution. On July 22, 2019, the DCAA issued a communication directing the Iowa Community Action Association and each of Iowa's seventeen community action agencies to notify interested persons, partners, and stakeholders about the public hearing. The DCAA also posted the State Plan public hearing notice on its website. The posting was on the website from **July 29, 2019 through August 8, 2019**.

Copies of the State Plan were also distributed to the Iowa Commission on Community Action Agencies (the DCAA's governing board) on July 22, 2019. The DCAA reviewed, provided the comments collected from the public inspection period and public hearing, and discussed the State Plan with commission members during their **August 13, 2019** meeting. The commission acted on the State Plan during their **August 13, 2019** meeting.

- 4.3. Public and Legislative Hearings:** 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 Act. (If the State has not held a public hearing in the prior fiscal year and/or a legislative hearing in the last three years, provide further detail).

Instructional Note: 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 [Select an option]
[Select a date]	[Narrative, Insert Address]	<ul style="list-style-type: none"> • Public • Legislative • Combined
ADD a ROW function Note: rows will be able to be added for each additional hearing		

Information that will be included in the table:

March 18, 2019, Iowa State Capitol, Room 103, 11:00 a.m., legislative hearing
August 9, 2019, Lucas State Office Building, Room 208, 9:00 a.m., public hearing

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

Attached:

- Notice of public inspection and public hearing news release (Attachment E)**
- State Plan distribution communications (Attachment F)**
- Notice of public inspection and public hearing announcement (Attachment G)**
- Legislative hearing agenda (Attachment H)**

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SECTION 5
CSBG Eligible Entities

5.1. CSBG Eligible Entities: In the table below, list each eligible entity in the State, and indicate public or private, the type(s) of entity, and the geographical area served by the entity. (This table should include every CSBG Eligible Entity to which the State plans to allocate 90 percent funds, as indicated in the table in item 7.2. Do not include entities that only receive remainder/discretionary funds from the State or tribes/tribal organizations that receive direct funding from OCS under Section 677 of the CSBG Act.)

CSBG Eligible Entity	Public or Nonprofit	Type of Entity (choose all that apply)	Geographical Area Served by county (Provide all counties)	Brief Description of "Other"
[Narrative, 2500 characters]	[Select Public or Nonprofit]	<ul style="list-style-type: none"> • Community Action Agency • Limited Purpose Agency • Local Government Agency • Migrant or Seasonal Farmworker Organization • Tribe or Tribal Organization • Other (describe in column 5) 	[Narrative, 2500 characters]	<p>[Narrative, 2500 characters]</p> <p>If "Other" is selected in column 3, provide further detail here</p>
ADD A ROW function Note: rows will be able to be added for each eligible entity funded in the State				

The attached information will be included in the table:
Iowa Community Action Agencies (Attachment I)

5.2. Total number of CSBG eligible entities

17

5.3. Changes to Eligible Entities List: Has the list of eligible entities under item 5.1 changed since the State's last State Plan submission? If yes, briefly describe the changes. Yes No

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 "no less than 90 percent" of their CSBG allocation, under Section 675B, to the eligible entities.

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. Click [HERE](#) for IM 138.

- 6.1. Choice of Standards:** Check the box that applies. If using alternative standards, a) attach the complete list of alternative organizational standards, b) describe the reasons for using alternative standards, and c) describe how the standards are at least as rigorous as the COE-developed standards.
- The State will use the CSBG Organizational Standards Center of Excellence (COE) organizational standards (as described in IM 138)
 - The State will use an alternative set of organizational standards [**Attach supporting documentation if this option is selected**]

- 6.2.** If the State is using the COE-developed organizational standards, does the State propose making a minor modification to the standards, as described in IM 138? Yes No

- 6.2a.** If yes was selected in item 6.2, describe the State's proposed minor modification to the COE-developed organizational standards, and provide a rationale.

N/A

- 6.3.** How will/has the State officially adopt(ed) organizational standards for eligible entities in the State in a manner consistent with the State's administrative procedures act? If "Other" is selected, provide a timeline and additional information, as necessary. [**Check all that applies**]
- Regulation
 - Policy
 - Contracts with eligible entities
 - Other, describe:

Other:

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.

- 6.4.** How will the State assess eligible entities against organizational standards, as described in IM 138? [**Check all that applies**]
- 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

6.4a. Describe the assessment process.

The Division of Community Action Agencies (DCAA) conducts CSBG organizational standards onsite assessments at each Iowa community action agency triennially (at least once during a three (3) year period). Onsite assessments are conducted at the same time regular CSBG program operations onsite reviews are conducted. Once the DCAA completes an onsite assessment, the DCAA issues a report no later than 60 calendar days following the onsite review exit meeting.

Desk-Monitoring (Desk-Reviews)

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

Agencies that are not scheduled to receive an onsite assessment during a federal fiscal year are required to complete and submit a CSBG organizational standards agency self-assessment. The DCAA provides instructions, guidance, and an agency self-assessment instrument for those agencies to complete and submit. The DCAA 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 the agency self-assessment.

The DCAA's onsite reviews and assessments schedule is provided in Section 10 (10.1). Full onsite reviews and assessments include a regular CSBG program operations onsite review and a CSBG organizational standards onsite assessment. The 12 agencies that are not scheduled for a review and assessment (no review) in FFY 2020, and the 11 agencies that are not scheduled for a review and assessment (no review) in FFY 2021, will be required to complete and submit a CSBG organizational standards agency self-assessment as directed by the DCAA.

GUIDING PRINCIPALS

The DCAA conducts its onsite 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.

- 6.5. Will the State make exceptions in applying the organizational standards for any eligible entities due to special circumstances or organizational characteristics, as described in IM 138? Yes No

- 6.5a. If yes was selected in item 6.5, list the specific eligible entities the State will exempt from meeting organizational standards, and provide a description and a justification for each exemption.

Public eligible entities are not required to complete and submit an IRS Form 990 to the Internal Revenue Service. Therefore, Iowa's public community action agencies are exempt from CSBG Organizational Standard 8.6, "The IRS Form 990 is completed annually and made available to the governing board for review." Iowa has one public agency.

- 6.6. **Performance Target:** What percentage of eligible entities in the State does the State expect will meet all the State-adopted organizational standards in the next year?

100%

Note: This information is associated with State Accountability Measures 6Sa and may pre-populate the State's annual report form.

**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

Other:

Formula + Floor

7.1a. Does the State statutory or regulatory authority specify the terms or formula for allocating the 90 percent funds among eligible entities? Yes No

7.2. Planned Allocation: Specify the planned allocation of 90 percent funds to eligible entities, as described under Section 675C(a) of the CSBG Act. The estimated allocations may be in dollars or percentages. For each eligible entity receiving funds, provide the Funding Amount in either dollars (columns 2 and 4) or percentage (columns 3 and 5) for the fiscal years covered by this plan.

Planned CSBG 90 Percent Funds				
CSBG Eligible Entity	Year One		Year Two	
	Funding Amount \$	Funding Amount %	Funding Amount \$	Funding Amount %
Will be auto-populated from Section 5, Table 5.1, Column 1	Enter either the dollar amount or percentage for each eligible entity for the first year that this plan covers		Enter either the dollar amount or percentage for each eligible entity for the second year that this plan covers (If this is a one-year plan, these columns can be left blank)	
Total	Totals will be auto-populated		Totals will be auto-populated	

The attached information will be included in the table.

FFY 2020 CSBG Allotment [Distribution and Agency Allocations] (Attachment J)

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; include information about State legislative approval or other types of administrative approval (such as approval by a board or commission).

Iowa law (2019 Iowa Acts, House File 756) addresses and provides the requirements for how Iowa’s FFY 2020 and FFY 2021 CSBG allotments are to be distributed and allocated by the Division of Community Action Agencies (DCAA).

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

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

1. 96% of Iowa's CSBG allotment is allocated to the agencies by poverty-level population percentages. Poverty 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 American Community Survey was used to calculate each agency's poverty-level population percentage.
2. The minimum allocation amount is \$160,000. Agencies that experienced an increase in their percentage of the state poverty-level population subsidize the minimum allocation level requirement. Agency poverty-level population percentage changes were calculated using the data from the U. S. Census Bureau's 2000 survey and the U. S. Census Bureau's 2010 American Community Survey.
3. If Iowa's annual FFY 2020 or FFY 2021 final CSBG allotment is less than \$6.57 million, the committee may revisit and act on the allocation formula requirements.

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

1. Prior to the start of the federal fiscal year the DCAA 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 DCAA.
 - Contracts include the agency's projected CSBG allocation and a project budget that equals the projected allocation amount.
2. Within 30 calendar days of receipt of Iowa's final CSBG allotment amount from the U. S. Department of Health and Human Services, Administration for Children and Families (ACF), the DCAA distributes the allotment, calculates final agency allocations, and then notifies each agency of their final allocation amount for the federal fiscal year.
3. Using their final allocation amount, agencies are allowed at least 30 calendar days from the DCAA's notification to prepare and submit a CSBG budget amendment request. Once a request is received and approved by the DCAA, the DCAA issues a contract amendment that includes the agency's final allocation amount and amended project budget. The DCAA issues contract amendments within 30 calendar days of the DCAA's receipt of the request.

NOTE: Within 30 calendar days of receiving any CSBG grant award notice from ACF, the DCAA distributes the CSBG funds, calculates the amount of funds available for each agency, and then notifies each agency of their amount. The amount the DCAA provides to each agency is the maximum amount of funds available for the agency to request until the DCAA receives additional CSBG grant award notices from ACF.

- 7.4. Distribution Timeframe:** Does the State plan to make funds available to eligible entities no later than 30 calendar days after OCS distributes the Federal award? Yes No

Note: Item 7.4 is associated with State Accountability Measure 2Sa and may pre-populate the State's annual report form.

- 7.4a.** If no, describe State procedures to ensure funds are made available to eligible entities consistently and without interruption.

N/A

- 7.5. Performance Management Adjustment:** How is the State improving grant and/or contract administration procedures under this State Plan as compared to past 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.

Note: This information is associated with State Accountability Measure 2Sb and may pre-populate the State's annual report form.

On Iowa's 2017 American Customer Satisfaction Index (ACSI) Eligible Entities Satisfaction with the States Survey report, the Division of Community Action Agencies (DCAA) scored 96 for Distribution of Funds. This was the national maximum score.

2019 ACSI report information will be included here.

The following distribution of funds goal is in Iowa's FFY 2018-2019 CSBG State Plan and Application. The DCAA met this goal in FFY 2018 and FFY 2019.

DISTRIBUTION OF FUNDS

The DCAA 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.

Based on a review of these results, the DCAA will determine if changes to its process for distributing CSBG funds to the agencies should be made. Any changes the DCAA decides to make will be included here.

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

- 7.6.** What amount of State CSBG funds does the State plan to allocate for administrative activities, under this State Plan? The estimate may be in dollars or a percentage.

4 percent

- 7.7.** How many State staff positions will be funded in whole or in part with CSBG funds under this State Plan?

5 (CSBG Program Managers (2), Division of Community Action Agencies (DCAA) Administrator, DCAA Administrative Assistant, and DCAA Budget Analyst)

- 7.8.** How many State Full Time Equivalents (FTEs) will be funded with CSBG funds under this State Plan?

2.11 (CSBG Program Manager 1.00 FTE, CSBG Program Manager 0.30 FTE, Division of Community Action Agencies (DCAA) Administrator 0.33 FTE, DCAA Administrative Assistant 0.33 FTE, and DCAA Budget Analyst 0.15 FTE)

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

7.9. Does the State have remainder/discretionary funds? Yes No

If yes was selected, describe how the State plans to use remainder/discretionary funds in the table below.

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

Instructional Note: The assurance under 676(b)(2) of the 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 row “f” 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 row a and row c. If allocation is not possible, the State may allocate the funds to the main category with which the activity is associated.

Note: This information is associated with State Accountability Measures 3Sa; the responses may pre-populate the State’s annual report form.

Use of Remainder/Discretionary Funds					
Remainder/ Discretionary Fund Uses (See 675C(b)(1) of the CSBG Act)	Year One		Year Two		Brief description of services/activities
	Planned \$	Planned %	Planned \$	Planned %	
a. Training/technical assistance to eligible entities	[Enter either a planned \$ or % for each item listed for the first year that this plan covers. If entering a percentage, the percentages must total 100%.]		[Enter either a planned \$ or % for each item listed second year that this plan covers. If entering a percentage, the percentages must total 100%.] [If this is a one-year plan, these columns can be left blank]		[Not Fillable] These planned services/activities will be described in State Plan item 8.1
b. Coordination of State-operated programs and/or local programs					[Optional Narrative, 2500 characters] These planned services/activities will be described in State Plan section 9, State Linkages and Communication.
c. Statewide coordination and communication among eligible entities					[Optional Narrative, 2500 characters] These planned services/activities will be described in State Plan section 9, State Linkages and Communication.
d. Analysis of distribution of CSBG funds to determine if targeting greatest need					[Narrative, 2500 characters]

Use of Remainder/Discretionary Funds					
Remainder/ Discretionary Fund Uses (See 675C(b)(1) of the CSBG Act)	Year One		Year Two		Brief description of services/activities
	Planned \$	Planned %	Planned \$	Planned %	
e. Asset-building programs					[Narrative, 2500 characters]
f. Innovative programs/ activities by eligible entities or other neighborhood groups					[REQUIRED Narrative, 2500 characters] Describe here or attach additional information.
g. State charity tax credits					[Narrative, 2500 characters]
h. Other activities, specify _____					[Narrative, 2500 characters]
Totals	Auto-Calculated	Auto-Calculated	Auto-Calculated	Auto-Calculated	

N/A

- 7.10. What types of organizations, if any, does the State plan 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]**
- 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
 - None (the State will carry out activities directly)

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

N/A

- 7.11. **Performance Management Adjustment:** How is the State adjusting the use of remainder/discretionary funds under this State Plan as compared to past 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.

Note: This information is associated with State Accountability Measures 3Sb, and will pre-populate the State's annual report form.

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 (see Section 7 (7.3 and 7.9)). Therefore, Use of Discretionary Funds scores and feedback from Iowa's American Customer Satisfaction Index (ACSI) Eligible Entities Satisfaction with States Survey reports do not apply.

SECTION 8
State Training and Technical Assistance

8.1. 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. Add a row for each activity: indicate the timeframe; whether it is training, technical assistance or both; and the topic. (CSBG funding used for this activity is referenced under item 7.9(a), Use of Remainder/Discretionary Funds.)

Note: 8.1 is associated with State Accountability Measure 3Sc and may pre-populate the State’s annual report form.

Training and Technical Assistance			
Fiscal Year (Y) Quarter (Q) / Timeframe	Training, Technical Assistance, or Both	Topic	Brief Description of “Other”
Dropdown options: <ul style="list-style-type: none"> • FY1 – Q1 • FY1 – Q2 • FY1 – Q3 • FY1 – Q4 • FY2 – Q1 • FY2 – Q2 • FY2 – Q3 • FY2 – Q4 • Ongoing / Multiple Quarters • All quarters 	Toggle Options: <ul style="list-style-type: none"> • Training • Technical Assistance • Both 	Dropdown Options: <ul style="list-style-type: none"> • Fiscal • Governance/Tripartite Boards • Organizational Standards – General • Organizational Standards – for eligible entities with unmet standards on Technical Assistance Plans (TAPs) or Quality Improvement Plans (QIPs) • Correcting Significant Deficiencies Among Eligible Entities • Reporting • ROMA • Community Assessment • Strategic Planning • Monitoring • Communication • Technology • Other 	[Narrative, 2500 characters] If “Other” is selected in column 3, describe in this column
ADD a ROW function Note: Rows will be able to be added for each additional training			

N/A

8.1a. The planned budget for the training and technical assistance plan (as indicated in the Remainder/Discretionary Funds table in item 7.9): _____

N/A

- 8.2. Does the State have in place Technical Assistance Plans (TAPs) or Quality Improvement Plans (QIPs) for all eligible entities with unmet organizational standards, if appropriate? Yes No

NOTE: 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: 8.2 is associated with State Accountability Measure 6Sb. QIPs are described in Section 678C(a)(4) of the CSBG Act. If the State, according to their corrective action procedures, does not plan to put a QIP in place for an eligible entity with one or more unmet organizational standards, the State should put a TAP in place to support the entity in meeting the standard(s).

- 8.3. Indicate the types of organizations through which the State plans to provide training and/or technical assistance as described in item 8.1, and briefly describe their involvement? (Check all that apply.) **[Check all that applies]**
- 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

N/A

- 8.4. **Performance Management Adjustment:** How is the State adjusting the training and technical assistance plan under this State Plan as compared to past 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.

Note: This information is associated with State Accountability Measures 3Sd and may pre-populate the State's annual report form.

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 training and technical assistance activities (see Section 7 (7.3 and 7.9)). Therefore, Use of Discretionary Funds scores and feedback from Iowa's American Customer Satisfaction Index (ACSI) Eligible Entities Satisfaction with States Survey reports do not apply.

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 plans 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)). Describe or attach additional information as needed. **[Check all that apply from the list below]**

Note: This response will link to the corresponding CSBG assurance, item 14.5. In addition, this item is associated with State Accountability Measure 7Sa and may pre-populate the State's annual report form.

- State Low Income Home Energy Assistance Program (LIHEAP) office
- State Weatherization office
- State Temporary Assistance for Needy Families (TANF) office
- State Head Start 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

- 9.2. State Linkages and Coordination at the Local Level:** Describe the linkages and coordination at the local level that the State plans to create or maintain with governmental and other social services, especially antipoverty programs, to assure the effective delivery of and coordination of CSBG services to low-income people and communities and avoid duplication of services (as required by assurances under Sections 676(b)(5) and (b)(6)). Attach additional information as needed.

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

The Division of Community Action Agencies (DCAA) links and coordinates efforts with governmental and social services programs. The DCAA Administrator or DCAA staff serve on the following committees or partner with the following organizations and groups that represent and make decisions that affect low-income families and individuals:

- **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**
- **Equal Justice Project Advisory Council**
- **Federal Home Visitation Advisory Committee (MIECHV)**
- **Iowa Community Colleges**
- **National Resource Center for Family Centered Practices (University of Iowa)**
- **Iowa Community Action Association (Board of Directors)**
- **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 DCAA's involvement with these organizations and groups results in increased coordination of programs, services, and initiatives, and assures that decisions affecting Iowa's low-income population are considered.

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 coordinate and establish linkages to assure the effective delivery of 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)). Attach additional information as needed.

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

Iowa's community action agencies, as part of their CSBG Community Action Plan and Application, are required to explain how their agency will address this CSBG Act assurance. The explanation must include descriptions of how their agency will coordinate with governmental and other social service programs delivering employment and training services to ensure that the 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 programs in order to better coordinate the effective delivery of services to low-income families and individuals and to avoid the duplication of services. Although agencies report different processes for establishing linkages, all agencies participate in community meetings, planning coalitions, have memberships on local boards and councils, 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 service programs. These coordination efforts help the agencies avoid the unnecessary duplication of programs, services, and community initiatives.

In FFY 2018, Iowa's agencies reported actively working with 5,151 public and private organizations to expand resources and opportunities in order to achieve family and community outcomes.

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

- 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.

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

Iowa's community action agencies, as part of their CSBG Community Action Plan and Application, are required to explain how their agency will address this CSBG Act assurance. The explanation must include a description of how their agency will coordinate and link their programs and services with other service providers to ensure low-income families and individuals receive the necessary and appropriate assistance they are seeking.

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, have memberships on local boards and councils, and network with state and local service providers. Through these meetings, memberships, and networking, agencies share and receive information regarding services and resources for low-income families and individuals, and develop partnerships with other anti-poverty organizations. These partnerships and linkages help ensure their clients will receive current information and referrals regarding available services and assistance.

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

- 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 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. 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 (DHR) and its Division of Community Action Agencies (DCAA) are involved in the following WIOA implementation activities:

The DHR's Division of Community Advocacy and Services is represented on the State Workforce Development Board Disability Access Committee, which is charged with addressing WIOA issues related to providing workforce services to individuals with disabilities, and is in a leadership position at the state level in assuring that local workforce boards are meeting mandatory one-stop certification requirements for accessibility.

The DCAA provides ongoing technical assistance to all Iowa community action agencies regarding participation on local WIOA boards, coordination of employment and training activities, and development and support of local Iowa Workforce Development (IWD) IowaWorks Centers.

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 families and individuals. 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).

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

The Division of Community Action Agencies (DCAA) is the State's lead agency for Iowa's Low-Income Home Energy Assistance Program (LIHEAP). The DCAA administers LIHEAP by contracting with Iowa's 17 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 onsite review and evaluation to ensure compliance with LIHEAP regulations. The DCAA's LIHEAP 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.

- 9.6. **State Assurance: Faith-based Organizations, Charitable Groups, 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.

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

Iowa's community action agencies, as part of their CSBG Community Action Plan and Application, are required to explain how their agency will address this CSBG Act assurance. The explanation must include a description of how their agency will coordinate, network, and develop partnerships with faith-based organizations, charitable groups, and community organizations that serve low-income families and individuals. 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, have memberships on local boards and councils, and network with state and local service providers. Through these meetings, memberships, and networking, agencies share and receive information regarding services and resources for low-income families and individuals, 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 2018, Iowa's agencies reported actively working with 5,151 public and private organizations to expand resources and opportunities in order to achieve family and community outcomes. Of those organizations, 1,058 were no-profit organizations and 654 were faith-based organizations.

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

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.

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

Iowa's community action agencies, as part of their CSBG Community Action Plan and Application, are required to explain how their agency will address this CSBG Act assurance. The explanation must include descriptions about how their agency will coordinate its CSBG funds or CSBG funded resources (i.e. office space, equipment, supplies, staff time) with public resources (funds and in-kind services received from city and county governments) and with private resources (funds, donations, and in-kind services received from: foundations, corporations, non-profits, private entities, etc.).

All agencies receive public and private funding, in-kind goods and services, and donations. In FFY 2018, agencies reported receiving over \$212 million in federal, state, public, and private resources. Of the \$212 million in resources, the following was leveraged from public and private entities:

\$ 2,130,442 – leveraged public (local) funding
\$ 2,056,266 – value of in-kind goods/services received from local government
\$ 16,975,950 – leveraged private funding
\$ 12,944,880 – value of donated items (food, clothing, furniture, etc.)
\$ 4,684,756 – value of in-kind services received from businesses

\$ 38,792,294 – 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, appliances, and clothing.

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

- 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 Division of Community Action Agencies (DCAA) 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 DCAA included ICAA and the agencies in the development of the State Plan. See Section 3 (3.4a) for a description of the steps the DCAA 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 DCAA and the Iowa Commission on Community Action Agencies (the DCAA'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 DCAA 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: Both DCAA CSBG Program Managers are members of the ICAA conference planning committee, and the DCAA provides funding and resources for conference training needs, workshop speakers, and recognition awards.

The DCAA Administrator 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 DCAA collaborates with ICAA on the planning and development of the State's comprehensive T&TA Plan.

Iowa Community Action Agency Trainings: The DCAA works with ICAA on identifying agency training needs and assisting ICAA on developing, organizing, and scheduling agency trainings.

The DCAA Administrator and DCAA CSBG 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 Needs Assessment Committee consists of 7 members (both DCAA CSBG 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.

Agency Client Tracking Systems: The DCAA 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 the State’s plan for communicating with eligible entities, the State Community Action Association, and other partners under this State Plan. Include communication about annual hearings and legislative hearings, as described under Section 4, CSBG Hearing Requirements.

Communication Plan			
Topic	Expected Frequency	Format (drop down)	Brief Description of “Other”
[Narrative, 2500 characters]	Dropdown Options: <ul style="list-style-type: none"> • Daily • Weekly • Twice-Monthly • Monthly • Quarterly • Semi-Annually • Annually • Other 	Dropdown Options: <ul style="list-style-type: none"> • Newsletter • Mailing • Meetings/Presentation • Blog • Email • Website • Social Media • Other 	[Narrative, 2500 characters] If “Other” is selected in columns 2 and/or 3, describe in this column
ADD a ROW function <i>Note: As many rows that are needed will be able to be added</i>			

The following information will be included in the table:

State Plan Public Hearing	Other (biennial)	e-mail, website, meetings
State Plan Legislative Hearing	Other (biennial)	e-mail
Agencies (CSBG Program Operations)	Other (as necessary)	e-mail, website, meetings, webinars, phone
ICAA (CSBG Program Operations)	Other (as necessary)	e-mail, meetings, phone
ICAA Board	Other (5 times a year)	meetings
ROMA Subgroup	Other (5 times a year)	meetings
Iowa Commission on Community Action Agencies	Quarterly	meetings, conference calls
ICAA Conference Planning Committee	Other (as necessary)	e-mail, meetings, webinars, conference calls, conference
State Training and Technical Assistance (T&TA) Plan	Other (as necessary)	e-mail, meetings

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

Note: This information is associated with State Accountability Measure 5S(iii). The measure indicates feedback should be provided within 60 calendar days of the State getting feedback from OCS.

The Division of Community Action Agencies (DCAA) will send via e-mail, to the Iowa Community Action Association (ICAA) and Iowa’s community action agencies, the information and feedback the DCAA receives from the Office of Community Services (OCS) about the DCAA’s performance on the state accountability measures. The e-mail will be sent within 60 calendars days of the DCAA getting the information and feedback from OCS.

The DCAA Administrator will present the DCAA’s state accountability measures information and feedback to ICAA and the agencies’ Executive Directors at an ICAA governing board meeting. The DCAA’s CSBG Program Managers will present the information and feedback to the members of the ROMA Subgroup at one of their meetings.

9.11. Performance Management Adjustment: How is the State adjusting the Communication plan in this State Plan as compared to past 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.

Note: This information is associated with State Accountability Measures 7Sb; this response may pre-populate the State’s annual report form.

On Iowa’s 2017 American Customer Satisfaction Index (ACSI) Eligible Entities Satisfaction with the States Survey report, the Division of Community Action Agencies (DCAA) scored a 93 for Communication. Within the Communication category, the DCAA scored the following:

- 97 Responsiveness of Staff to Requests
- 95 Consistency of Responses
- 94 Clarity of Communication
- 93 Usefulness of Feedback
- 92 Frequency of Communication
- 86 Sufficiency of Information

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

2019 ACSI report information will be included here.

The following communication goals are in Iowa’s FFY 2018-2019 CSBG State Plan and Application:

COMMUNICATION

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

The DCAA met these communication goals in FFY 2018, and as of the date this State Plan was submitted, the DCAA was meeting these communication goals in FFY 2019.

Also, as of the date this State Plan was submitted, the DCAA has fulfilled the planned actions in its FFY 2018-2019 Communication Plan. See Iowa’s FFY 2018-2019 CSBG State Plan and Application – Section 9 (9.9).

Based on a review of these results, the DCAA will determine if changes to its communication plans and efforts should be made. Any changes the DCAA decides to make will be included here.

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 on-site reviews; on-site 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.
For States that have a monitoring approach that does not fit within the table parameters, attach the State’s proposed monitoring schedule.

Note: This information is associated with State Accountability Measure 4Sa(i); this response may pre-populate the State’s annual report form.

CSBG Eligible Entity	Review Type	Target Date	Date of Last Full Onsite Review (if applicable)	Brief Description of “Other”
Will auto-populate from item 5.1	Dropdown Options: <ul style="list-style-type: none"> • Full onsite • Newly Designated • Follow-up • Other • No review 	Dropdown Options: <ul style="list-style-type: none"> • FY1 Q1 • FY1 Q2 • FY1 Q3 • FY1 Q4 • FY2 Q1 • FY2 Q2 • FY2 Q3 • FY2 Q4 	Select a date	[Narrative, 2500 characters] If “Other” is selected in column 2, describe in this column

The attached information will be included in the table:
Monitoring of Iowa Community Action Agencies (Attachment K)

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

Attachment:

Iowa CSBG Policies and Procedures Manual (7-2-2018): CSBG Program Reviews (pages 25-33) and Fiscal Monitoring (page 34) (Attachment L)

- 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?

Note: This item is associated with State Accountability Measure 4Sa(ii) and may pre-populate the State’s annual report form.

60 calendar days

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 of closure of findings included in the State monitoring protocols attached above? Yes No

10.4a. If no, describe State procedures for addressing eligible entity findings/deficiencies, and the documenting of closure of findings.

N/A

10.5. Quality Improvement Plans (QIPs): How many eligible entities are currently on Quality Improvement Plans?

Note: The QIP information is associated with State Accountability Measures 4Sc.

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?

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

The Division of Community Action Agencies (DCAA) will determine through CSBG program operations onsite reviews, CSBG organizational standards onsite assessments, CSBG fiscal monitoring onsite reviews, DCAA 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 DCAA. When the DCAA determines that an agency has one or more significant deficiencies, the DCAA will require the agency to develop and implement a quality improvement plan (QIP) to correct the deficiencies. The DCAA 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 DCAA, will be reported to OCS within 30 calendar days of the DCAA’s approval decision. As directed, the DCAA will notify its OCS, CSBG Program Services, Program Specialist.

10.7. Assurance on Funding Reduction or Termination: Does the State assure, according to Section 676(b)(8), 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).” 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. Does the State CSBG statute and/or regulations provide for the designation of new eligible entities? Yes No

10.8a. If yes, provide the citation(s) of the law and/or regulation. If no, describe State procedures for the designation of new eligible entities.

2019 Iowa Code 216A.93 (State legislation)
Iowa Administrative Code 427-22.12 (State regulation)

10.9. Does the State CSBG statute and/or regulations provide for de-designation of eligible entities?
 Yes No

10.9a. If yes, provide the citation(s) of the law and/or regulation. If no, describe State procedures for de-designation of eligible entities.

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

10.10. Does the State CSBG statute and/or regulations specify a process the State CSBG agency must follow to re-designate an existing eligible entity?
 Yes No

10.10a. If yes, provide the citation(s) of the law and/or regulation. If no, describe State procedures for re-designation of existing eligible entities.

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

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 onsite 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 Division of Community Action Agencies. 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. If these procedures are described in the State monitoring protocols attached under item 10.2, indicate the page number.

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

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, department 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.

- 10.13. Assurance on Federal Investigations:** Will the State "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

- 10.14. Performance Management Adjustment:** How is the State adjusting monitoring procedures in this State Plan as compared to past 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 this State is not making any adjustments, provide further detail.

Note: This item is associated with State Accountability Measure 4Sb and may pre-populate the State's annual report form.

On Iowa's 2017 American Customer Satisfaction Index (ACSI) Eligible Entities Satisfaction with the States Survey report, the Division of Community Action Agencies (DCAA) scored a 95 for Monitoring and Corrective Action. Within the Monitoring and Corrective Action category, the DCAA scored a 96 for Consistency of Monitoring and a 94 for Usefulness of Visits. The consistency of monitoring and usefulness of visits scores were national maximums.

2019 ACSI report information will be included here.

The following monitoring goals are in Iowa's FFY 2018-2019 CSBG State Plan and Application:

MONITORING

1. The DCAA will conduct CSBG program operations onsite reviews at:
 - a. 6 of 17 agencies in FFY 2018
 - b. 6 of 17 agencies in FFY 2019
2. The DCAA will conduct CSBG organizational standards onsite assessments at:
 - a. 6 of 17 agencies in FFY 2018
 - b. 6 of 17 agencies in FFY 2019
3. The DCAA will conduct CSBG organizational standards agency self-assessment desk-reviews for:
 - a. 11 of 17 agencies in FFY 2018
 - b. 11 of 17 agencies in FFY 2019
4. The DCAA will disseminate a CSBG program operations onsite review report within 60 calendar days of an agency's onsite review exit date.
5. The DCAA will disseminate a CSBG organizational standards onsite assessment report within 60 calendar of an agency's onsite assessment exit date.
6. The DCAA will disseminate a CSBG organizational standards agency self-assessment validation report within 60 calendar days of receipt of an agency's self-assessment.
7. All Iowa community action agency annual audits that require a management decision for audit findings will be issued a DCAA management decision within 180 calendar days of receipt of the annual audit.

The DCAA met all of its FFY 2018 monitoring goals, and as of the date this State Plan was submitted, the DCAA was meeting all of its FFY 2019 monitoring goals.

Based on a review of these results, the DCAA will determine if changes to its monitoring and corrective action procedures and activities should be made. Any changes the DCAA decides to make will be included here.

SECTION 11
Eligible Entity Tripartite Board

11.1. Which of the following measures are taken to ensure that the State verifies CSBG Eligible Entities are meeting Tripartite Board requirements under Section 676B of the CSBG Act? **[Check all that applies]**

- Attend Board meetings
- Review copies of Board meeting minutes
- Track Board vacancies/composition
- Other

Other:

1. **CSBG program operations onsite reviews include a governing board structure (composition) review and a review of governing board rosters and board member attendance. Governing board rosters and board member attendance reviews confirm whether or not an Iowa community action agency is in compliance with the following Iowa CSBG program policies:**

VACANCIES AND ATTENDANCE

Agencies must have policies for filling vacant governing board member seats in their by-laws.

The following are considered governing board deficiencies by Iowa's CSBG Program:

- **Agency governing board member seats that have been vacant for 9 months or longer**
- **Agency governing board members that have not attended any of the agency's board meetings for 9 months or longer**

2. **CSBG organizational standards onsite assessments include a review of three CSBG organizational standards (5.1, 5.2, and 5.5) that address the requirements in Section 676B of the CSBG Act.**

Agencies that are not scheduled to receive a CSBG organizational standards onsite assessment during FFY 2020 or FFY 2021 will be required to complete a CSBG organizational standards agency self-assessment. The Division of Community Action Agencies will validate, through a desk-review process, CSBG organizational standards 5.1, 5.2, and 5.5.

11.2. How often does the State require eligible entities (which are not on TAPs or QIPs) to provide updates (e.g., copies of meeting minutes, vacancy alerts, changes to bylaws, low-income member selection process, etc.) regarding their Tripartite Boards? **[Check all that applies]**

- Annually
- Semiannually
- Quarterly
- Monthly
- Other

11.3. Assurance on Eligible Entity Tripartite Board Representation: Describe how the State will carry out the assurance under Section 676(b)(10) of the CSBG Act that the State will require eligible entities to have policies and procedures by which individuals or organizations can petition for adequate representation on an eligible entities' Tripartite Board.

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

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 Division of Community Action Agencies (DCAA) also has CSBG contract requirements and written policies specific to this CSBG Act assurance.

As part of the DCAA's CSBG program operations onsite 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.

- 11.4.** 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 Division of Community Action Agencies (DCAA) has written policies that allow Iowa's public community action agency 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; and the requested mechanism must meet the requirements in the Iowa Code (Chapter 216A.94). Public agencies interested in using another governing board mechanism must contact the DCAA 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 DCAA.

Currently, Iowa's public community action agency has rules in its by-laws that require a tripartite governing board structure.

SECTION 12
Individual and Community Income Eligibility Requirements

12.1. Required Income Eligibility: What is the income eligibility threshold for services in the State?

- 125% of the HHS poverty line
- X % of the HHS poverty line (fill in the threshold): _____ %
- Varies by eligible entity

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 ELIGIBILITY AND VERIFICATION

Iowa's community action agencies are required to use 125% of the most 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 most current HHS Poverty Guidelines for determining the client's eligibility for the agency's CSBG services or benefits.

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 most 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.

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 agency CSBG funded services or benefits. Once the income has been verified, the agency must use the most current HHS Poverty Guidelines for determining the family's eligibility for the agency's 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:** For services with limited in-take procedures (where individual income verification is not possible or practical), how does the State ensure eligible entities generally verify income eligibility for services? 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 most 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 Division of Community Action Agencies (DCAA) CSBG program operations onsite reviews, the DCAA 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 (3) years, if applicable. The inspection confirms whether or not the agency is verifying client income and determining client eligibility as described in their CSBG application, and is using 125% of the HHS Poverty Guidelines as the ceiling for determining eligibility for clients receiving agency CSBG funded emergency and non-emergency general/short term services or benefits.

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

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 Division of Community Action Agencies (DCAA) 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 DCAA's CSBG program operations onsite reviews, the DCAA inspects the agency's community-targeted services documentation from the last three (3) years (if applicable) 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. ROMA Participation: In which performance measurement system will the State and all eligible entities participate, as required by Section 678E(a) of the CSBG Act and the assurance under Section 676(b)(12) of the CSBG Act?

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

- 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

13.1a. If ROMA was selected in item 13.1, attach and/or 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; and Iowa's CSBG Community Action Plan and Application includes Community Action NPI collection and reporting requirements.

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 Division of Community Action Agencies also includes ROMA participation requirements in the CSBG contracts it issues to the agencies.

13.1b. If ROMA was not selected in item 13.1, describe the system the State will use for performance measurement.

N/A

13.2. 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?

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

- CSBG National Performance Indicators (NPIs)
- NPIs and others
- Others

13.3. How does the State support the eligible entities in using the ROMA system (or alternative performance measurement system)?

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.

Iowa law (2019 Iowa Acts, House File 756) addresses and provides the requirements for how Iowa’s FFY 2020 and FFY 2021 CSBG allotments are to be distributed and allocated by the Division of Community Action Agencies (DCAA). The Iowa law does not distribute or allocate CSBG funds to the DCAA for remainder/discretionary activities.

Although the DCAA does not receive CSBG funding for remainder/discretionary activities, the DCAA still collaborates with and provides support to Iowa’s community action agencies in using the ROMA performance measurement system. The following are the DCAA’s ROMA support initiatives:

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 developing their CSBG application. This 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 DCAA CSBG Program Managers attend all of the agencies’ ROMA Subgroup meetings. This 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: Both DCAA CSBG Program Managers are members of ICAA’s conference planning committee, and the DCAA provides funding and resources for conference training needs, workshop speakers, and recognition awards. Each year the conference offers ROMA training and information workshops.

State Training and Technical Assistance (T&TA) Plan: The DCAA collaborates 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 DCAA works with ICAA on identifying agency training needs and assisting ICAA on developing, organizing, and scheduling agency trainings. ICAA provides on-site, on-line, and on-demand ROMA training for agency staff and agency governing board members. The ICAA Training Director is a Master ROMA-Certified Trainer.

Nationally Certified ROMA Trainer and Implementer Candidates: The DCAA supports, and will continue to support, agency staff that plan to submit an application to the ROMA-Certified Trainer or ROMA-Certified Implementer training programs.

Agency Client Tracking Systems: The DCAA 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 7 members (both DCAA CSBG 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. The DCAA has community assessment data and information on its website that agencies can access and use to develop a comprehensive community assessment (CSBG Organizational Standards – Category 3).

13.4. Eligible Entity Use of Data: How is the State validating that the eligible entities are using data to improve service delivery?

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

Annually, Iowa's community action agencies are required to complete and submit a CSBG Community Action Plan and Application to the Division of Community Action Agencies (DCAA). 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 have had on individuals, families, and communities, and 3) explain how they will use their final outcomes review to make adjustments and improvements to their agency's individual and family programs and services, and community initiatives. The DCAA reviews each agency's Community Action NPIs throughout the CSBG program year and provides feedback. The DCAA also inspects and discusses the Community Action NPIs with the agency during their CSBG program operations onsite review.

The DCAA's CSBG organizational standards onsite assessments includes 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 DCAA 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 DCAA reviews the information the agency provides. The DCAA also discusses the information with the agency during their CSBG program operations onsite review.

Community Action Plans and Needs Assessments

- 13.5.** 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.

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

Annually, Iowa's community action agencies are required to complete and submit an agency CSBG Community Action Plan and Application to the Division of Community Action Agencies (DCAA). Agency CSBG application requirements are addressed in the Iowa Administrative Code (427-22.5), Iowa's CSBG policies and procedures manual, and in the CSBG application instructions. DCAA review and acceptance requirements are also addressed in the Iowa Administrative Code (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 DCAA 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 DCAA Administrator.

- 13.6. State Assurance:** 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.

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

Annually, Iowa's community action agencies are required to complete and submit a CSBG Community Action Plan and Application to the Division of Community Action Agencies (DCAA). 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 participate 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.

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 Division of Community Action Agencies 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 onsite reviews and desk-reviews.

As part of their CSBG Community Action Plan and Application, agencies are required to explain how their agency will use their CSBG funds to support the activities listed in this CSBG Act assurance. 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 address this CSBG Act assurance. The explanation must include information about how their agency will use their CSBG funds to support youth development programs, programs and services with youth components, and, if applicable, information about the youth development programs that their agency plans to be significantly involved with during the next two CSBG program years. 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 the 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, college 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 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 address this CSBG Act assurance. The explanation must include information about how their agency will use their CSBG funds or CSBG funded resources (i.e. office space, equipment, supplies, staff time) to support or coordinate with other programs and services that are designed to assist low-income families and individuals. 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 Division of Community Action Agencies' CSBG program operations onsite reviews and CSBG organizational standards onsite 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) 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.”

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

[No response; links to 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 675C(a), 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 families and individuals.

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 families and individuals; information about their agency’s service area, office locations, accessibility, and intake processes; how their agency will provide or coordinate services for low-income families and individuals that need services and assistance during their agency’s non-business hours; how their agency will provide or coordinate services for low-income families and individuals 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).

All agencies have outreach site office systems in place for serving clients. Outreach staff are trained to provide case management and assessment services for clients and their families. These services ensure that clients 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 clients 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 clients 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.”

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

[No response; links to 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 675C(a) will be coordinated with other public and private resources.”

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

[No response; links to 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 675C(a)] 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.”

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). In this State Plan, the State indicates funds allocated for these activities under item 7.9(f).

Iowa's community action agencies, as part of their CSBG Community Action Plan and Application, are required to explain how their agency will use their CSBG funds to support innovative community and neighborhood-based initiatives related to the purposes of the CSBG. The explanation must include: information about how their agency will use its 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; information about the community and neighborhood initiatives their agency is planning to be significantly involved with during the next two CSBG program years; and, if applicable, how their agency will use their CSBG funds or CSBG funded resources 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, small business start-up, 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.

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 address this CSBG Act assurance. The explanation must include information about how their agency will ensure food will be provided in emergency situations to low-income families and individuals that are seeking immediate food assistance, and information about the emergency food programs and services their agency is planning to be significantly involved in during the next two CSBG program years. 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 clients with a 3 to 7 day supply of nutritious food. Clients with transportation problems are referred to other food providers or delivered a food package. Once a client's emergency food needs are met, agencies will assess and provide case management services to the client and enroll them or refer them to appropriate food assistance and other necessary programs and services.

The 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.

Fifteen 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 families and individuals.

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.”

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.

[No response; links to 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.”

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

[No response; links to 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.”

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

[No response; links to 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).”

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

[No response; links to 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.”

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

[No response; links to 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.”

Note: the State describes this assurance in the Eligible Entity Tripartite Board section, 11.3

[No response; links to 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]

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), 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.”

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

[No response; links to 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.”

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.

[No response for this item]

- 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.

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