

Iowa Community Services Block Grant Program

FFY 2026-2027 COMMUNITY SERVICES BLOCK GRANT (CSBG) STATE PLAN AND APPLICATION

DRAFT

Community Services Block Grant Program
Division of Community Access and Eligibility
Iowa Department of Health and Human Services
Lucas State Office Building
Des Moines, Iowa 50319

Phone: (515) 724-2746 • Email: Ben.Banowitz@hhs.iowa.gov

SECTION 1

CSBG Administrative Information

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

1.1a. Provide the federal fiscal years this plan covers. Year One: FFY 2026
Year Two: FFY 2027

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

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

☒ Yes ☐ No

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

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

1.2a. Lead Agency: DIVISION OF COMMUNITY ACCESS AND ELIGIBILITY

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

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

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

IOWA DEPARTMENT OF HEALTH AND HUMAN SERVICES

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

Name and Title: ERIN DRINNIN DIRECTOR OF DIVISION OF
COMMUNITY ACCESS AND ELIGIBILITY

1.2e. Street Address: LUCAS STATE OFFICE BUILDING, 321 E. 12 STREET

1.2f. City: DES MOINES

1.2g. State: IOWA

1.2h. Zip Code: 50319

1.2i. Telephone Number: 515-732-1177

1.2j. Fax Number NA

1.2k. Email Address: erin.drinnin@hhs.iowa.gov

1.2l. Lead Agency Website: <https://hhs.iowa.gov/initiatives/csbq>

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

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

Attachment A: Designation Letter

- 1.4. CSBG Point of Contact:** Provide the following information in relation to the designated state CSBG point of contact. The state CSBG point of contact should be the person that will be the main point of contact for CSBG within the State. Has information regarding the state point of contact changed since the last submission of the State Plan?

☒ Yes ☐ No

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

- ☒ Agency Name
- ☒ Point of Contact
- ☐ Street Address

- ☐ City
- ☐ State
- ☐ Zip Code
- ☒ Office Number
- ☐ Fax Number
- ☒ Email Address
- ☐ Website

1.4a. Agency Name: DIVISION OF COMMUNITY ACCESS AND ELIGIBILITY

1.4b. Point of Contact Name and Title: BEN BANOWETZ, CSBG PROGRAM MANAGER

1.4c. Street Address: LUCAS STATE OFFICE BUILDING, 312 E 12th STREET

1.4d. City: DES MOINES

1.4e. State: IOWA

1.4f. Zip Code: 50319

1.4g. Telephone Number: 515-724-2746

1.4h. Fax Number: NA

1.4i. Email Address: Ben.Banowetz@hhs.iowa.gov

1.4j. Agency Website: <https://hhs.iowa.gov/initiatives/csbq>

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

There is currently a Community Action Association within the State.

☒ Yes ☐ No

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

☐ Yes ☒ No

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

- ☐ Agency Name
- ☐ Executive Director
- ☐ Street Address
- ☐ City
- ☐ State
- ☐ Zip Code
- ☐ Office Number
- ☐ Fax Number
- ☐ Email Address
- ☐ Website
- ☐ RPIC Lead

- 1.5a.** Agency Name: IOWA COMMUNITY ACTION ASSOCIATION
- 1.5b.** Executive Director or Point of Contact and Title: KATHERINE RILEY HARRINGTON, EXECUTIVE DIRECTOR
- 1.5c.** Street Address: P.O. BOX 41608
- 1.5d.** City: DES MOINES
- 1.5e.** State: IOWA
- 1.5f.** Zip Code: 50311
- 1.5g.** Telephone Number: 515-244-0328
- 1.5h.** Fax Number: 515-280-3377
- 1.5i.** Email Address: kharrington@iowacaa.org
- 1.5j.** State Association Website: <https://iowacommunityaction.org>
- 1.5k.** State Association currently serves as the Regional Performance Innovation Consortia (RPIC) lead.
☐ Yes ☒ No

SECTION 2

State Legislation and Regulation

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

☒ Yes ☐ No

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

☒ Yes ☐ No

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

Attachment B: Iowa Code (state legislation)

Attachment C: 2025 Iowa Acts, Senate File 626 (state legislation)

Attachment D: Iowa Administrative Code (state regulations)

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

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

☒ Yes ☐ No

2025 Iowa Acts, Senate File 626

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

☐ Yes ☒ No

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

☒ Yes ☐ No

SECTION 3

State Plan Development and Statewide Goals

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

The mission of the Iowa Department of Health and Human is to provide high quality programs and services that protect and improve the health and resiliency of individuals, families and communities. The societal vision of the department is that individuals, families and communities are safe, resilient and empowered to be healthy and self-sufficient. The organizational vision is that Iowa HHS is a trusted leader and partner in protecting health and providing high quality, equitable services.

The State CSBG Office is one of three bureaus within the Community Action Agencies (CAA) subdivision in the Division of Community Access and Eligibility at Iowa HHS. The mission of the Community Action Agencies Subdivision 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 CAA subdivision 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 CAA Subdivision are to:

1. 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;
2. 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;
3. Implement accountability measures for its programs and require regular reporting on the measures by the community action agencies; and
4. Issue an annual report to the Governor and General Assembly each year.

The responsibilities are defined in the Iowa Code, Chapter 216A, Subchapter 5 (state regulations).

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

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

The State CSBG Office's FFY 2026 and FFY 2027 CSBG specific goals for administration of CSBG under this State Plan are:

DISTRIBUTION OF FUNDS

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

MONITORING

1. The State CSBG Office will conduct CSBG program operations reviews at:
 - a. 5 of 16 agencies in FFY 2026
 - b. 6 of 16 agencies in FFY 2027
2. The State CSBG Office will conduct CSBG organizational standards assessments at:
 - a. 5 of 16 agencies in FFY 2026
 - b. 6 of 16 agencies in FFY 2027
3. The State CSBG Office will conduct CSBG organizational standards agency self-assessment desk-reviews for:
 - a. 11 of 16 agencies in FFY 2026
 - b. 10 of 16 agencies in FFY 2027
4. The State CSBG Office will complete and issue a CSBG program operations review report within 60 calendar days of an agency's review exit meeting date.
5. The State CSBG Office will complete and issue a CSBG organizational standards assessment report within 60 calendar days of an agency's assessment exit meeting date.
6. The State CSBG Office will complete and issue a CSBG organizational standards agency self-assessment validation letter or report within 60 calendar days of receipt of an agency's self-assessment.

COMMUNICATION

1. The Director of the State CSBG Office or a State CSBG Office Program Manager will attend and report on the State CSBG Office's programs at Iowa Community Action Association (ICAA) Board of Directors' meetings. The State CSBG Office will attend ICAA Board of Directors' meetings as invited.
2. The State CSBG Office Program Manager will attend and present a CSBG program report at all Iowa community action agency Results Oriented Management and Accountability (ROMA) Subgroup meetings.

STATE PLAN DEVELOPMENT

1. The Director of the State CSBG Office or a State CSBG Office Program Manager will solicit feedback from agencies related to the development of the State Plan

LINKAGES

1. The Director of the State CSBG Office or a State CSBG Office Program Manager will work to increase linkages.

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

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

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

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

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

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

3.3c. Consultation with [Check all that apply]

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

3.4. Eligible Entity Involvement

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

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

February 20, 2025: The State CSBG Program Manager attended the agencies' ROMA Subgroup meeting and provided an update on the planning for updating the State Plan.

April 3, 2025: The Director of the Community Action Agencies subdivision attended ICAA's Board of Directors' meeting and provided a progress update on the development of the State Plan.

April 10, 2025: The State CSBG Program Manager attended the agencies' ROMA Subgroup meeting. The CSBG Program Manager provided information about the State Plan, the State CSBG Office's State Plan development process, and a progress update.

April 24, 2025: The State CSBG Program Manager created and disseminated a survey to the subgrantees to gather feedback regarding the State Plan.

May 8, 2025: The State CSBG Program Manager sent a reminder to all agencies to respond to the survey seeking feedback regarding the State Plan.

May 20, 2025: The State CSBG Program Manager sent a final reminder to all agencies to respond to the survey seeking feedback regarding the State Plan.

June 11, 2025: The State CSBG Program Manager and the Director of the Community Action Agencies subdivision analyzed the survey data regarding the State Plan.

May 1, 2025: The Director of the Community Action Agencies subdivision attended ICAA's Board of Directors' meeting and provided a progress update on the development of the State Plan.

June 5, 2025: The Director of the Community Action Agencies subdivision attended ICAA's Board of Directors' meeting and provided a progress update on the development of the State Plan.

July 7, 2025: The State CSBG Office distributed, through e-mail, copies of the final draft State Plan and document that summarizes each section of the State Plan to ICAA, the Executive Directors, and ROMA Subgroup members.

July 10, 2025: The Director of the Community Action Agencies subdivision attended ICAA's Board of Directors' meeting. During the meeting, the Director provided a progress update on the development of the State Plan and fielded State Plan questions during the meeting.

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

3.4b. Performance Management Adjustment: Describe how the state has adjusted its State Plan development procedures under this State Plan, as compared to previous State Plans, in order to 1) encourage eligible entity participation and 2) to ensure the State Plan reflects input from eligible entities. Any adjustment should be based on the state's analysis of past

performance in these areas, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the state is not making any adjustments, provide further detail.

The following are the Development of CSBG State Plan scores from Iowa's American Customer Satisfaction Index (ACSI) Eligible Entities Satisfaction with the States Survey reports: 67 (2015 ACSI), 85 (2017 ACSI), 83 (2019 ACSI), 90 (2021 ACSI), and 62 (2025 ACSI.) ACSI scores of 80-89 are considered excellent, 90-100 exceptional.

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

Since the February 2017 adjustments, Iowa's ACSI scores for Development of the CSBG State Plan and the scores within the Development of the CSBG State Plan category have consistently been in the excellent and exceptional range. In the recently received 2025 scores, Iowa has had a significant change in its score for Development of the CSBG State Plan. In the four years since the last survey the Iowa Office has been moved under a new State office and has new leadership at several levels. While the State strives to involve the agencies, it is clear from the 2025 survey this needs to be expanded. The State has already created and disseminated a survey to all agencies and ICAA to gauge what areas of the State Plan they would like to have input on in addition to open-ended questions to inquire about ways they would like to be more involved. The State has used the feedback from the survey to enhance the involvement of agencies in the State Plan development. In addition, the State has presented State Plan updates at all ROMA subgroup meetings and ICAA Board meetings leading up to the development of the State Plan.

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

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

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

Year One: 95

Year Two: 95

The following are the Overall Satisfaction scores from Iowa's American Customer

Satisfaction Index (ACSI) Eligible Entities Satisfaction with the States Survey reports: 92 (2015 ACSI), 97 (2017 ACSI), 95 (2019 ACSI), 97 (2021 ACSI), and 91 (2025 ACSI.) ACSI scores of 80-89 are considered excellent, 90-100 exceptional.

For this performance period (FFY 2026 and FFY 2027), the State CSBG Office set its targets for agency overall satisfaction at 95. These target scores would be an improvement from the 2025 score of 91.

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

SECTION 4

CSBG Hearing Requirements

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

Iowa's State Plan public inspection and comment period was from July 15, 2025, through July 28, 2025. On July 18, 2025, the State CSBG Office issued its public inspection and public hearing notice with posting guidance to the Iowa Community Action Association (ICAA) and each of Iowa's sixteen community action agencies. On July 18, 2025, the State CSBG Office posted the public inspection and public hearing notice on its website and its office building bulletin boards. The notice notified interested persons, partners, and stakeholders that the State Plan was available for inspection on the State CSBG Office's website.

- 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 July 29, 2025. On July 10, 2025, the State CSBG Office issued its public inspection and public hearing notice with posting guidance to the Iowa Community Action Association (ICAA) and each of Iowa's sixteen community action agencies. On July 10, 2025 the State CSBG Office issued a public inspection notice for statewide distribution. On July 10, 2025, the State CSBG Office posted the public inspection and public hearing notice on its website and its office building bulletin boards. The posting was on the State CSBG Office's website from July 10, 2025 through July 28, 2025.

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

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

Date	Location	Type of Hearing
April 23, 2025	Iowa State Capitol, Room 103, 4:00 p.m.	Legislative
July 29, 2025	Virtual Hearing Origination Site is the Lucas State Office Building, Room 317, 3:00 p.m.	Public

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

Attachment E: State Plan distribution communications

Attachment F: Notice of public inspection and public hearing announcement

Attachment G: Legislative hearing documentation

SECTION 5 CSBG Eligible Entities

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

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

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

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

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

The attached information will be included in the table:
Attachment H: CSBG Eligible Entities

5.2. Total number of CSBG eligible entities: 16

5.3. Changes to Eligible Entities List: Describe any changes that have occurred to the eligible entities within the State since the last federal fiscal year, as applicable.

One or more of the following changes were made to the eligible entities list.

[Check all that apply]

- ☐ Designation and/or Re-Designation
- ☐ De-Designation and/or Voluntary Relinquishments
- ☐ Mergers
- ☒ No Changes to Eligible Entities List

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

N/A

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

N/A

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

N/A

SECTION 6

Organizational Standards for Eligible Entities

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

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

☒ COE CSBG Organizational Standards

☐ Modified version of COE CSBG Organizational Standards

☐ Alternative set of organizational standards

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

N/A

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

N/A

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

N/A

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

☐ Regulation

☒ Policy

☒ Contracts with eligible entities

☒ Other, describe:

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

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

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

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

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

Desk-Monitoring (Desk-Reviews)

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

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

The review and assessment schedule for the State CSBG Office is provided in Section 10 (10.1). Full onsite reviews and assessments include a regular CSBG program operations review and a CSBG organizational standards assessment. The 11 agencies that are not scheduled for a review and assessment (no review) in FFY 2026, and the 10 agencies that are not scheduled for a review and assessment (no review) in FFY 2027, will be required to complete and submit a CSBG organizational standards agency self-assessment as directed by the State of Iowa's CSBG Office.

GUIDING PRINCIPLES

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

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

☐ Yes ☒ No

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

N/A

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

Year One: 93%

Year Two: 93%

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

SECTION 7 State Use of Funds

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

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

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

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

Iowa will use a FORMULA + FLOORS method for allocating its CSBG allotments.

In response to the results of the most recently available census data, Iowa revised its CSBG allocation formula requirements using Iowa's poverty-level data from the U.S. Census Bureau's 2020 decennial survey. Iowa's revised CSBG allocation formula is being phased-in over three federal fiscal years (FFY 2023, FFY 2024, and FFY 2025). This has not changed since the last State Plan and the phase-in is complete.

The following are Iowa's CSBG allocation formula requirements:

- Iowa shall use poverty-level data (individuals at or below 125% of the U.S. Department of Health and Human Services Poverty Guidelines) from the U.S. Census Bureau's 2020 decennial survey to calculate each Iowa community action agency's percentage of the state's poverty-level population
- Iowa shall use poverty-level data (individuals at or below 125% of the U.S. Department of Health and Human Services Poverty Guidelines) from the U.S. Census Bureau's 2010 and 2020 decennial surveys to calculate:
 - Each agency's change in their percentage of the State's poverty-level population
 - The proportional share of the subsidy for the agencies that are required to subsidize the minimum allocation levels
- Iowa's minimum allocation level is \$185,000

- The following are the minimum allocation levels for the agencies that had a decrease in their percentage of the state's poverty-level population and do not qualify for the \$185,000 minimum allocation:

<u>Agency</u>	<u>Minimum Allocation Level</u>
Community Action of Eastern Iowa	\$721,848
North Iowa Community Action Organization	\$335,259
Northeast Iowa Community Action Corporation	\$262,717
Operation Threshold	\$492,717
Community Action of Southeast Iowa	\$299,593
Upper Des Moines Opportunity	\$431,848
West Central Community Action	\$531,944
Community Action Agency of Siouxland	\$306,565

- The agencies that had an increase in their percentage of the state's poverty-level population subsidize the minimum allocation levels. The following are the agencies that subsidize the minimum allocation levels and their proportional share (as a percentage) of the subsidy:

<u>Agency</u>	<u>Subsidy Share (%)</u>
Hawkeye Area Community Action Program	45.7741%
IMPACT Community Action Partnership	40.1643%
New Opportunities	6.9875%
Mid-Iowa Community Action	5.1650%
Sieda Community Action	1.9091%

- If Iowa's final CSBG annual allotment is less than \$7.36 million, the State CSBG Office, Iowa Community Action Association, and the Executive Directors from the agencies may revisit and act on Iowa's CSBG allocation formula requirements
- If through federal CSBG reauthorization States may revise the CSBG program poverty line to exceed 125% of the official poverty line, the State CSBG Office, Iowa Community Action Association, and Executive Directors from the agencies may revisit and act on Iowa's CSBG allocation formula requirements.

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

☒ Yes ☐ No

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

Year One: 96%

Year Two: 96%

Planned CSBG 90 Percent Funds

CSBG Eligible Entity	Year One	Year Two
	Funding Amount \$	Funding Amount \$
Total		

The attached information will be included in the table.

Attachment I: Planned Allocation (FFY 2026 and FFY 2027)

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

Iowa law (2025 Iowa Acts, Senate File 626) addresses and provides the requirements for how Iowa's FFY 2026 and FFY 2027 CSBG allotments are to be distributed and allocated by the State CSBG Office.

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

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

1. 96% of Iowa's CSBG allotment is allocated to the agencies using state poverty-level population percentages. See Section 7 (7.1a. Formula Description) for calculation information.
2. Iowa's CSBG minimum allocation level for agencies is \$185,000. See Section 7 (7.1a. Formula Description) for calculation and subsidizing information.
3. If Iowa's final CSBG annual allotment is less than \$7.36 million, the committee may revisit and act on the allocation formula requirements.

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

1. Prior to the start of the federal fiscal year the State CSBG Office issues a CSBG contract to each agency. Agencies are issued a contract after their annual CSBG Community Action Plan and Application is accepted by the State CSBG Office. The contracts include the agency's projected CSBG allocation, a project budget that equals the projected allocation amount, along with required contract language from the State.

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

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

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

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

☒ Yes ☐ No

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

N/A

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

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

On Iowa's 2025 American Customer Satisfaction Index (ACSI) Eligible Entities Satisfaction with the States Survey report, the State CSBG Office scored 88 for Distribution of Funds. ACSI scores of 80-89 are considered excellent, 90-100 exceptional. While this falls in the upper tier of 'excellent' it is a decline from the 2021 ACSI scores. When the State CSBG office was moved to Iowa HHS a new payment process was implemented and refined. During the transition, some payments took longer than before (though within 30 days.) The State has been working with internal HHS fiscal and payment departments to streamline the distribution of funds process, and we have been told the process is now working well, and in some cases, faster than before.

DISTRIBUTION OF FUNDS

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

For FFY 2024, the State CSBG Office received five CSBG grant award notices. The State CSBG Office made the CSBG funds available to Iowa's community action agencies within 30 calendar days of receipt of the notice for all award notices. As of the date this State Plan was submitted, the State CSBG Office was meeting its FFY 2025 distribution of funds goal.

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

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

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

Year One: 4%

Year Two: 4%

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

Year One: 3 (Director, CSBG Program Manager, and Budget Analyst)

Year Two: 3 (Director, CSBG Program Manager, and Budget Analyst)

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

Year One: 1.27 (0.10 Director, 1.00 CSBG Program Manager and 0.17 Budget Analyst)

Year Two: 1.27 (0.10 Director, 1.00 CSBG Program Manager and 0.17 Budget Analyst)

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

7.9. Remainder/Discretionary Funds Use: Does the state have remainder/discretionary funds, as described in Section 675C(b) of the CSBG Act?
☐ Yes ☒ No

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

N/A

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

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

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 and/or Activities
	Planned \$	Planned \$	
7.9a. Training/technical assistance to eligible entities			These planned services/activities will be described in State Plan item 8.1.
7.9b. Coordination of State-operated programs and/or local programs			These planned services/activities will be described in State Plan Section 9, State Linkages and Communication.
7.9c. Statewide coordination and communication among eligible entities			These planned services/activities will be described in State Plan Section 9, State Linkages and Communication.

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 and/or Activities
	Planned \$	Planned \$	
7.9d. Analysis of distribution of CSBG funds to determine if targeting greatest need			Specify the other activities funded through discretionary funds.
7.9e. Asset-building programs			
7.9f. Innovative programs/ activities by eligible entities or other neighborhood groups			
7.9g. State charity tax credits			
7.9h. Other activities			
Totals			

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

N/A

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

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

[Check all that apply]

- ☐ The state directly carries out all activities (no partnerships)
- ☒ The state does not have remainder/discretionary funds
- ☐ The state partially carries out some activities

- ☐ CSBG eligible entities (if checked, include the expected number of CSBG eligible entities to receive funds)
- ☐ Other community-based organizations
- ☐ State Community Action Association
- ☐ Regional CSBG technical assistance provider(s)
- ☐ National technical assistance provider(s)
- ☐ Individual consultant(s)
- ☐ Tribes and Tribal Organizations
- ☐ Other, specify:

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

7.11. **Use of Remainder/Discretionary Funds Performance Management**

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

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

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

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

SECTION 8

State Training and Technical Assistance

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

Training and Technical Assistance

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

The following information will be included in the table:

FFY 2026 (4th quarter) - Training - Other - Iowa Community Action Association Annual Conference

FFY 2027 (4th quarter) - Training - Other - Iowa Community Action Association Annual Conference

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

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

Year One: \$5,000

Year Two: \$5,000

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

The State CSBG Office collaborates with the Iowa Community Action Association (ICAA) in planning and delivering training and technical assistance to Iowa's community action agencies. During this planning period (FFY 2026 and FFY 2027,) the State CSBG Office will partner with ICAA on the following training and technical assistance initiatives:

- The ICAA Annual Conference: The State CSBG Office Program Manager is a member of the ICAA conference planning committee, and the State CSBG Office will provide funding and resources for conference training needs, workshop speakers, and recognition awards.
- State Training and Technical Assistance Plan: The State CSBG Office will collaborate with ICAA on the planning and development of the State's comprehensive Training and Technical Assistance Plan.
- Iowa Community Action Agency Trainings: The State CSBG Office will work with ICAA on identifying agency training needs and assisting ICAA on developing, organizing, and scheduling agency trainings.

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

☐ Yes ☐ No

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

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

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

N/A

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

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

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

On Iowa's 2025 American Customer Satisfaction Index (ACSI) Eligible Entities Satisfaction with the States Survey report, the State CSBG Office scored 86 for Training and Technical Assistance. While this is down from the previous ACSI Index, it still falls within the 'excellent' range. ACSI scores of 80-89 are considered excellent, 90-100 exceptional.

The State CSBG Office will continue its practices of providing timely CSBG guidance and administrative assistance to the agencies. The State will continue to collaborate with the Iowa Community Action Association (ICAA) in identifying needs, planning and delivering T/TA to the agencies. Based on a review of the ACSI scores, the largest decline was in Effectiveness of Assistance. The State will collaborate with ICAA to address effectiveness of the T/TA provided to agencies. Additionally, the State will provide financial support and resources for the FFY 2026 and FFY 2027 ICAA Annual Conferences (see Section 8 (8.1)).

SECTION 9

State Linkages and Communication

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

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

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

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

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

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

- Iowa Family Development Alliance
- Iowa Council on Homelessness
- Early Childhood Iowa
- Iowa Coalition Against Domestic Violence
- Prevent Child Abuse Iowa
- Iowa Legal Aid
- Iowa Community Action Association

- Iowa Community Action Association Conference Training Committee
- Iowa Weatherization Assistance Coordinators
- Iowa Directors of Energy Assistance
- Iowa ROMA Subgroup
- Region VII Regional Performance Innovation Consortia (RPIC)

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

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

9.3. Eligible Entity Linkages and Coordination

9.3a. State Assurance of Eligible Entity Linkages and Coordination:

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

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

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

In FFY 2024, Iowa's agencies reported actively working with 5,857 public and private organizations to expand resources and opportunities in order to achieve family and community outcomes.

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

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

9.3b. State Assurance of Eligible Entity Linkages to Fill Service Gaps:

Describe how the eligible entities will develop linkages to fill identified gaps in the services, through the provision of information, referrals, case management, and follow-up consultations, according to the assurance under Section 676(b)(3)(B) of the CSBG Act.

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

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

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

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

9.4. Workforce Innovation and Opportunity Act (WIOA) Employment and Training

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

☐ Yes ☒ No

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

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

community antipoverty strategy.

N/A

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

Iowa's Department of Workforce Development is the lead agency for planning and implementation of the Unified Plan for WIOA.

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

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

The State Low-Income Home Energy Assistance Program (LIHEAP) and the State CSBG office are both housed in the Community Action Agencies subdivision within the Iowa HHS Office. The State LIHEAP Office administers LIHEAP by contracting with Iowa's 16 community action agencies.

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

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

Several agencies also receive emergency energy crisis intervention funds from other sources including General Relief, United Way, Salvation Army, County Relief,

Emergency Solutions Grants Program, Emergency Food and Shelter National Board Program, churches, ministerial associations, local utilities, and customer contribution funds. These funds are used for emergency payment arrangements with local utilities, emergency fuel deliveries, and reconnection services.

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

9.6. Faith-based Organizations, Charitable Groups, and Community

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

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

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

In FFY 2024, Iowa's agencies reported actively working with 5,857 public and private organizations to expand resources and opportunities to achieve family and community outcomes. Of those organizations, 1,215 were non-profit organizations and 736 were faith-based organizations.

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

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

9.7 Coordination of Eligible Entity 90 Percent Funds with Public/Private

Resources: Describe how the eligible entities will coordinate CSBG 90 percent funds with other public and private resources, according to the assurance under Section 676(b)(3)(C) of the CSBG Act.

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

All agencies receive public and private funding, in-kind goods and services, and donations. In FFY 2024, agencies reported receiving over \$298 million in federal, state, public, and private resources. Of the \$298 million in resources, the following was leveraged from public and private entities:

\$ 1,644,483 – leveraged public (local) funding

\$ 1,821,939 – value of in-kind goods/services received from local government

\$ 20,150,594 – leveraged private funding

\$ 18,938,498 – value of donated items (food, clothing, furniture, etc.)

\$ 8,661,864 – value of in-kind services received from businesses

\$ 51,217,378 – TOTAL public (local) and private resources leveraged

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

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

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

9.8. Coordination among Eligible Entities and State Community Action

Association: Describe state activities for supporting coordination among the eligible entities and the State Community Action Association.

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

- **State Plan Development:** The State CSBG Office includes ICAA and the agencies in the development of the State Plan. See Section 3 (3.4a) for a description of the steps the State CSBG Office took to involve ICAA and the agencies.
- **ICAA's Legislative Agenda:** Each year the ICAA governing board develops their legislative action and advocacy plan. ICAA includes the State CSBG Office in their legislative agenda and policy interests discussions.
- **The ICAA Annual Conference:** The State CSBG Office Program Manager is a member of the ICAA conference planning committee, and the State CSBG Office provides funding and resources for conference training needs, workshop speakers, and recognition awards.

- The State CSBG Office Program Manager, the Director of the Community Action Agencies State Office and ICAA staff serve on the Region VII Regional Performance Innovation Consortia (RPIC.) The Region VII RPIC provides training and technical assistance, coordinates state, regional and national efforts, and disseminates information on CSBG Organizational Standards, Results-Oriented Management and Accountability (ROMA), and Evidence-Based/Evidence-Informed Service Strategies.
- State Training and Technical Assistance (T&TA) Plan: The State CSBG Office collaborates with ICAA on the planning and development of the State's comprehensive T&TA Plan.
- Iowa Community Action Agency Trainings: The State CSBG Office works with ICAA on identifying agency training needs and assisting ICAA on developing, organizing, and scheduling agency trainings.
- The State CSBG Office Program Manager and the Director of the Community Action Agencies State Office attend and present Community Action and CSBG information at the ICAA board meetings and the agencies' ROMA Subgroup meetings.
- Needs Assessment Committee: The committee consists of 9 members (both State CSBG Office Program Manager, the ICAA Training Director, and 7 agency staff.) The committee is responsible for designing client and community surveys, developing instructions and guidance for administering the surveys, and creating statewide reports using the survey results.
- Agency Client Tracking Systems: The State CSBG Office and ICAA work the agencies and the agencies' client tracking system vendors to ensure the systems track, collect, and report individual, family, and community level data, information, and outcomes.

9.9. Communication with Eligible Entities and the State Community Action

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

Communication Plan

Subject Matter	Expected Frequency	Format
Upcoming Public and/or Legislative Hearings	As Needed	Meetings, Email
State Plan Development	As Needed	Meetings, Email
Organizational Standards Progress	Annually	1:1, Email, Phone Calls, Letters
	Annually	

Communication Plan

Subject Matter	Expected Frequency	Format
State Accountability Measures Progress	Annually	Meetings, Email
Community Needs Assessments/Community Action Plans	Annually	1:1, Email, Phone Calls, Letters
State Monitoring Plans and Policies	As Needed	Meetings, Email
Training and Technical Assistance (T/TA) Plans	Semi-Annually	1:1, Email, Phone Calls, Letters
ROMA and Performance Management	As Needed	1:1, Email, Phone Calls, Letters
State Interagency Coordination	Quarterly	Meetings, Email, Phone Calls
CSBG Programmatic Updates	Annually	
Tripartite Board Requirements	As Needed	Meetings, Email, Website, Webinars
State Training and Technical Assistance Plan	As Needed	1:1, Email, Phone Calls, Letters
Iowa Community Action Association Conference Planning		Meetings, Email
		Meetings, Email, Webinars, Phone Calls

9.10. Feedback to Eligible Entities and State Community Action Association:

Describe how the state will provide information to local entities and the State Community Action Association regarding performance on State Accountability Measures.

The State CSBG Office will send via e-mail, to the Iowa Community Action Association (ICAA) and Iowa's community action agencies, the information and feedback received from the Office of Community Services (OCS) about the State CSBG Office's performance on the state accountability measures. The e-mail will be sent within 60 calendars days of receipt of the information and feedback from OCS. The 2025 ACSI results were received on April 2, 2025 and sent out to the agencies on April 29, 2025.

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

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

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

On Iowa's 2025 American Customer Satisfaction Index (ACSI) Eligible Entities Satisfaction with the States Survey report, the State CSBG Office scored an 87 for Communication. Within the Communication category, the State CSBG Office scored the following:

92	Responsiveness of Staff to Requests
84	Sufficiency of Information
87	Usefulness of Feedback
90	Consistency of Responses
85	Clarity of Communication
83	Frequency of Communication

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

The following communication goals are in Iowa's FFY 2024-2025 CSBG State Plan and Application:

COMMUNICATION

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

The State CSBG Office met its communication goals in FFY 2024, and as of the date this State Plan was submitted, was meeting its goals in FFY 2025.

Also, as of the date this State Plan was submitted, the State CSBG Office was meeting all of the planned actions in its FFY 2024-2025 Communication Plan.

Based on a review of the scores and results, the State CSBG Office will endeavor to provide more clear and useful information more frequently.

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

SECTION 10

Monitoring, Corrective Action, and Fiscal Controls

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

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

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

Monitoring Schedule

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

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

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

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

Attachment K: Monitoring Policies

- Iowa CSBG Policies and Procedures Manual (12-6-2024):
- CSBG Program Reviews (Monitoring) (pages 21-28)
 - Fiscal Monitoring (page 29)

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

60 calendar days

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

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

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

☒ Yes ☐ No

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

N/A

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

0 (none)

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

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

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

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

- 10.7. Assurance on Funding Reduction or Termination:** The state assures that "any eligible entity that received CSBG funding the previous fiscal year will not have its funding terminated or reduced below the proportional share of funding the entity

received in the previous fiscal year unless, after providing notice and an opportunity for a hearing on the record, the state determines that cause exists for such termination or such reduction, subject to review by the Secretary as provided in Section 678C(b)" per Section 676(b)(8) of the CSBG Act.

☒ Yes ☐ No

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

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

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

☒ Yes ☐ No

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

Iowa Code 216A.93 (state legislation)

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

N/A

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

☐ Yes ☒ No

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

N/A

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

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

The State CSBG Office's procedures are described and made available to Iowa's community action agencies through Iowa's CSBG State Plan and Application and Iowa's CSBG policies and procedures manual. The State

Plan, manual, CSBG Act, and OCS, CSBG Information Memorandum, Transmittal No. 116 are available for agencies on the State CSBG Office's website.

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

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

☐ Yes ☒ No

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

N/A

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

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

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

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

Fiscal Controls and Audits and Cooperation Assurance

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

The name of the Enterprise Resource Planning system has changed since the last State Plan, it used to be I/3 and now is Iowa Advantage. Iowa Advantage supports

Iowa's financial processes such as accounts payable, accounts receivable, procurement, general accounting, fixed assets, budget preparation, and applicant tracking.

Iowa Advantage requires at least two authorized individuals to approve each expenditure (claim for payment) that is entered into the system.

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

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

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

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

The following are the 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 Iowa HHS, as directed in the agency's CSBG contract. The Iowa HHS reviews all agency annual audits.

Once the Iowa HHS receives an agency audit, Iowa HHS 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 Iowa HHS contracts have been met, and generally accepted accounting principles followed. Any audit issues or findings related to the agency's Iowa HHS contracts will be communicated in the response letter along with the necessary corrective action requirements.

The Office of Auditor of State reviews Iowa HHS, Division of Administration, Accounting Services audit review procedures annually. The Office of Auditor of State also audits the Iowa HHS annually for compliance with the requirements of laws, regulations, contracts, and grant applications. The audit of compliance is conducted in accordance with U. S. Generally Accepted Auditing Principles, the standards applicable to financial audits contained in Government Auditing Standards as issued by the Comptroller General of the United States, and the Office of Management and Budget, Uniform Administrative Requirements, Cost Principles, and Audit Requirements.

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

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

☒ Yes ☐ No

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

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

☐ Yes ☒ No

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

On Iowa's 2025 American Customer Satisfaction Index (ACSI) Eligible Entities Satisfaction with the States Survey report, the State CSBG Office scored a 94 for Monitoring and Corrective Action. Within the Monitoring and Corrective Action category, the State CSBG Office scored the following:

97	Adherence to Plan
93	Clarity of Feedback
94	Clarity of Process
93	Timeliness of Feedback

95 Consistency of Monitoring

91 Usefulness of Visits

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

The following monitoring goals are in Iowa's FFY 2024-2025 CSBG State Plan and Application:

MONITORING

1. The State CSBG Office will conduct CSBG program operations onsite reviews at:
 - a. 6 of 16 agencies in FFY 2024
 - b. 5 of 16 agencies in FFY 2025
2. The State CSBG Office will conduct CSBG organizational standards onsite assessments at:
 - a. 6 of 16 agencies in FFY 2024
 - b. 5 of 16 agencies in FFY 2025
3. The State CSBG Office will conduct CSBG organizational standards agency self-assessment desk-reviews for:
 - a. 10 of 16 agencies in FFY 2024
 - b. 11 of 16 agencies in FFY 2025
4. The State CSBG Office will complete and issue a CSBG program operations onsite review report within 60 calendar days of an agency's onsite review exit meeting date.
5. The State CSBG Office will complete and issue a CSBG organizational standards onsite assessment report within 60 calendar of an agency's onsite assessment exit meeting date.
6. The State CSBG Office will complete and issue a CSBG organizational standards agency self-assessment validation letter or report within 60 calendar days of receipt of an agency's self-assessment.

The State CSBG Office met all of its other monitoring goals in FFY 2024, and as of the date this State Plan was submitted, was meeting its FFY 2025 monitoring goals.

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

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

SECTION 11

Eligible Entity Tripartite Board

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

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

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

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

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

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

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

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

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

- ☒ Yes ☐ No

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

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

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

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

SECTION 12

Individual and Community Income Eligibility Requirements

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

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

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

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

CLIENT INCOME VERIFICATION AND ELIGIBILITY

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

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

Income Eligibility for General/Short Term Services:

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

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

The public funds for the child's or youth's support should not be used when verifying the family's income for CSBG funded services or benefits.

Once the income has been verified, the agencies must use the current HHS Poverty Guidelines for determining the family's eligibility for the CSBG services or benefits.

Poverty Line:

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

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

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

Income Eligibility for General/Short Term Services:

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

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

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

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

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

COMMUNITY-TARGETED SERVICES

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

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

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

SECTION 13

Results Oriented Management and Accountability (ROMA) System

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

[Select one]

- ☒ The Results Oriented Management and Accountability (ROMA) System
- ☐ Another performance management system that meets the requirements of Section 678E(b) of the CSBG Act
- ☐ An alternative system for measuring performance and results

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

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

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

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

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

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

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

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

N/A

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

☒ CSBG National Performance Indicators (NPIs)

☐ NPIs and others

☐ Other, describe:

The model ROMA performance measurement system that OCS facilitated the development of, is the Community Action National Performance Indicators (NPIs). The Community Action NPIs measure the impact Community Action programs, services, and initiatives have on individuals, families, and communities, and measure the progress towards achieving the following 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 program has adopted and use the Community Action NPI's for collecting and reporting community action agency outcomes, and for measuring agency performance.

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

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

Iowa law (2025 Iowa Acts, Senate File 626) addresses and provides the requirements for how Iowa's FFY 2026 and FFY 2027 CSBG allotments are to be distributed and allocated by the State CSBG Office. The Iowa law does not distribute or allocate CSBG funds to the State CSBG Office for remainder/discretionary activities.

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

- Iowa's CSBG Community Action Plan and Application: Iowa's CSBG application requires agencies to follow the ROMA cycle of assessment, planning, implementation, achievement of results, and evaluation for planning and administering their CSBG program. The CSBG application ensures that each agency's CSBG program will be outcome-based, anti-poverty focused, and tie directly to community needs assessments.

- **ROMA Subgroup Meetings:** The State CSBG Office Program Manager attends all the agencies' ROMA Subgroup meetings. The subgroup meets at least five (5) times a year. The subgroup is made up of agency staff that have ROMA and CSBG roles and responsibilities at their agencies. The CSBG Program Manager is on all meeting agendas and provide federal and state CSBG and Community Action updates and information.
- **Iowa Community Action Association (ICAA) Annual Conference:** The State CSBG Office Program Manager is a member of ICAA's conference planning committee. The State CSBG Office provides funding and resources for conference training needs, workshop speakers, and recognition awards. The conference offers ROMA training and information workshops.
- **State Training and Technical Assistance (T&TA) Plan:** The State CSBG Office Program Manager collaborate with ICAA on the planning and development of the state's comprehensive T&TA Plan. The T&TA Plan includes ROMA training opportunities for the agencies. The T&TA activities ICAA does relies on support of RPIC and CSBG funding.
- **Iowa Community Action Agency Trainings:** The State CSBG Office Program Manager works with ICAA on identifying agency training needs and assisting ICAA on developing, organizing, and scheduling agency trainings. ICAA provides onsite, on-line, and on-demand ROMA training for agency staff and governing board members. The ICAA Training Director is a Master ROMA-Certified Trainer.
- **Nationally Certified ROMA Trainer and Implementer Candidates:** The State CSBG Office supports, and will continue to support, agency staff that plan to apply to the ROMA-Certified Trainer or ROMA-Certified Implementer training programs.
- **Agency Client Tracking Systems:** The State CSBG Office and ICAA work with the agencies' client tracking system vendors to ensure the systems track, collect, and report individual, family, and community level data, information, and outcomes.
- **Needs Assessment Committee:** The Needs Assessment Committee consists of nine members (the State CSBG Office Program Manager, the ICAA Training Director, and 7 agency CSBG staff). The committee is responsible for designing client and community surveys, developing instructions and guidance for administering the surveys, and creating statewide reports. Information from the reports can be used by the agencies for planning, developing, and prioritizing agency programs, services, and community initiatives. The State CSBG Office will work with ICAA to administer the surveys.
- **State CSBG Office's Members Only Website:** The State CSBG Office's Members Only website includes a community assessment resources

section. Agencies can access and use the information on the website for planning and developing a comprehensive community assessment.

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

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

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

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

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

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

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

Community Action Plans and Needs Assessments

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

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

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

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

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

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

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

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

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

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

14.1 Use of Funds Supporting Local Activities

CSBG Services

14.1a. 676(b)(1)(A): Describe how the state will assure “that funds made available through grant or allotment will be used –

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

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

processes, certification and assurance requirements, and program operations and fiscal monitoring reviews.

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

Needs of Youth

14.1b. 676(b)(1)(B) Describe how the state will assure “that funds made available through grant or allotment will be used –

- (B) to address the needs of youth in low-income communities through youth development programs that support the primary role of the family, give priority to the prevention of youth problems and crime, and promote increased community coordination and collaboration in meeting the needs of youth, and support development and expansion of innovative community-based youth development programs that have demonstrated success in preventing or reducing youth crime, such as--
 - (i) programs for the establishment of violence-free zones that would involve youth development and intervention models (such as models involving youth mediation, youth mentoring, life skills training, job creation, and entrepreneurship programs); and
 - (ii) after-school child care programs;

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

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

Several agencies administer programs that include youth components, such as, the Family Development and Self-Sufficiency program; Women,

Infants, and Children (WIC); and Child Care. These programs provide health, nutrition, counseling, education, and/or protection services for youth and teenaged parents.

Coordination of Other Programs

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

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

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

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

State Use of Discretionary Funds

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

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

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

Eligible Entity Service Delivery, Coordination, and Innovation

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

Eligible Entity Service Delivery System

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

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

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

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

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

Eligible Entity Linkages – Approach to Filling Service Gaps

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

[No response; links to 9.3b]

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

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

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

[No response; links to 9.7]

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

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

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

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

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

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

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

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

Eligible Entity Emergency Food and Nutrition Services

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

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

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

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

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

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

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

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

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

State Coordination/Linkages and Low-income Home Energy Assistance

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

[No response; links to 9.2 and 9.5]

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

Federal Investigations

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

[No response; links to 10.13]

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

Funding Reduction or Termination

- 14.8. 676(b)(8)** Provide “an assurance that any eligible entity in the State that received funding in the previous fiscal year through a community services block

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

[No response; links to 10.7]

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

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

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

[No response; links to 9.6]

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

Eligible Entity Tripartite Board Representation

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

[No response; links to item 11.3]

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

Eligible Entity Community Action Plans and Community Needs Assessments

- 14.11. 676(b)(11)** Provide “an assurance that the state will secure from each eligible entity in the State, as a condition to receipt of funding by the entity through a community services block grant made under this subtitle for a program, a community action plan (which shall be submitted to the Secretary, at

the request of the Secretary, with the State Plan) that includes a community-needs assessment for the community served, which may be coordinated with community-needs assessments conducted for other programs.”

[No response; links to items 13.5 and 13.6]

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

State and Eligible Entity Performance Measurement: ROMA or Alternate system

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

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

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

Validation for CSBG Eligible Entity Programmatic Narrative Sections

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

[No response for this item]

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

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

SECTION 15

Federal Certifications

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

15.1 Lobbying

Certification for Contracts, Grants, Loans, and Cooperative Agreements

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

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

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

Statement for Loan Guarantees and Loan Insurance

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

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

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

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

15.2 Drug-Free Workplace Requirements

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

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

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

- (7) If the workplace identified to the agency changes during the performance of the grant, the grantee shall inform the agency of the change(s), if it previously identified the workplaces in question (see paragraph five).
- (8) Definitions of terms in the Nonprocurement Suspension and Debarment common rule and Drug-Free Workplace common rule apply to this certification. Grantees' attention is called, in particular, to the following definitions from these rules:

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

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

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

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

Certification Regarding Drug-Free Workplace Requirements

Alternate I. (Grantees Other Than Individuals)

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

- (a) Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;
- (b) Establishing an ongoing drug-free awareness program to inform employees about - -
 - (1) The dangers of drug abuse in the workplace;
 - (2) The grantee's policy of maintaining a drug-free workplace;
 - (3) Any available drug counseling, rehabilitation, and employee assistance programs; and
 - (4) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;
- (c) Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph (a);

- (d) Notifying the employee in the statement required by paragraph (a) that, as a condition of employment under the grant, the employee will - -
 - (1) Abide by the terms of the statement; and
 - (2) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;
- (e) Notifying the agency in writing, within 10 calendar days after receiving notice under paragraph (d)(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;
- (f) Taking one of the following actions, within 30 calendar days of receiving notice under paragraph (d)(2), with respect to any employee who is so convicted - -
 - (1) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
 - (2) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;
- (g) Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs (a), (b), (c), (d), (e) and (f).

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

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

**321 East 12th Street
Lucas State Office Building – 3rd 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.