



**Community Services Block Grant (CSBG)  
2023-2024 Indiana State Plan**

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**For the questions below, Indiana’s responses are underlined.**

## SECTION 1: CSBG Administrative Information

- 1.1. Identify whether this is a one-year or a two-year plan: Two-Year  
1.1a. Provide the federal fiscal years this plan covers: 2023/2024

- 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?** No

1.2a. **Lead agency** Indiana Housing and Community Development Authority

1.2b. **Cabinet or administrative department of this lead agency**

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

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

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 the authorized representative on the SF-424M and the official recipient of the Notice of Award per Office of Grant Management requirements.

**Name** Emily Krauser

**Title** Director of Community Programs

1.2e. **Street Address** 30 S. Meridian, Suite 900

1.2f. **City** Indianapolis

1.2g. **State** Indiana

1.2h. **Zip Code** 46204

1.2i. **Telephone Number** 317-232-7777

1.2j. **Fax Number** 317-232-7778

1.2k. Email Address [csbg@ihcda.in.gov](mailto:csbg@ihcda.in.gov)

1.2l. Lead Agency Website <https://www.in.gov/ihcda/>

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. [Will attach to final plan.]

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

If yes, select the fields that have changed.

- |  |   |   |                                     |
|--|---|---|-------------------------------------|
| <input type="checkbox"/> Agency Name   | <input checked="" type="checkbox"/> <u>Point of Contact</u> | <input type="checkbox"/> Street Address | <input type="checkbox"/> City       |
| <input type="checkbox"/> State         | <input type="checkbox"/> Zip Code                           | <input type="checkbox"/> Office Number  | <input type="checkbox"/> Fax Number |
| <input type="checkbox"/> Email Address | <input type="checkbox"/> Website                            |   |                                     |

1.4a. **Agency Name** Indiana Housing and Community Development Authority

1.4b. **Point of Contact Name**

**Name** Tina Darling

**Title** Community Programs Manager-CSBG

1.4c. **Street Address** 30 S. Meridian, Suite 900

1.4d. **City** Indianapolis

1.4e. **State** Indiana

1.4f. **Zip Code** 46204

1.4g. **Telephone Number** 317-232-7777

1.4h. **Fax Number** 317-232-7778

1.4i. **Email Address** [csbg@ihcda.in.gov](mailto:csbg@ihcda.in.gov)

1.4j. **Agency Website** <https://www.in.gov/ihcda/>

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

**There is currently a state Community Action Association within the state.** Yes

**Has information regarding the state Community Action Association changed since the last submission of the State Plan?** No

1.5a. **Agency name** Indiana Community Action Agency

1.5b. **Executive Director or Point of Contact**

**Name** Ed Gerardot

**Title** Executive Director

**1.5c. Street Address** 1845 West 18th Street

**1.5d. City** Indianapolis

**1.5e. State** Indiana

**1.5f. Zip Code** 46202

**1.5g. Telephone Number** 317-686-4232

**1.5h. Fax Number** 317-634-7947

**1.5i. Email Address** [egeradot@incap.org](mailto:egeradot@incap.org)

**1.5j. State Association Website** <https://www.incap.org/>

**1.5k. State Association currently serves as the Regional Performance Innovation Consortia (RPIC) lead** No

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## SECTION 2: State Legislation and Regulation

- 2.1. **CSBG State Legislation:** State has a statute authorizing CSBG. Yes
- 2.2. **CSBG State Regulation:** State has regulations for CSBG. 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 Item 2.2.  
Community Action Agencies, Indiana Code 2021:  
<http://iga.in.gov/legislative/laws/2021/ic/titles/012#12-14-23>
- 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. No
- 2.4b. **Regulation Amendments:** State established or amended regulations for CSBG last federal fiscal year. 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.

IHCDA's mission is to provide housing opportunities, promote self-sufficiency, and strengthen communities across Indiana. IHCDAs maintains oversight of the Indiana CSBG funding through approved distribution formulas and reimbursement procedures, as well as monitoring of the Community Action Agencies on compliance with both State and Federal Standards.

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

IHCDA continually hears about the administrative burden of CSBG and works to find ways to address it. We have found that increased and continuous opportunities for open communication are key to addressing this concern. IHCDAs will continue to create such opportunities by (but not limited to) increasing one-on-one interaction, creating peer-to-peer and small-group training cohorts, continuing monthly office hours, and conducting in-person site visits. IHCDAs will continue to help eligible entities with capacity-building with emphasis on the state-agency monitoring partnership. Strategies include IHCDAs releasing the rebranded/ revised CAR Tool in early 2023 (following a year-long process completed in collaboration with the network), soliciting agency feedback, and leading training sessions to facilitate its use. IHCDAs will continue to use discretionary funds for agencies to use for direct T&TA post-monitoring. IHCDAs will continue to increase awareness of community action agencies and their work across the state. Strategies include engaging with other state agency meetings and conferences to promote community action, marketing materials and press releases developed by IHCDAs's Marketing and Communications team, and official recognition of Community Action Month by the Governor's Office. Finally, IHCDAs will work to improve the network's ability to collect a unique count of individuals served. Strategies include training on how unique counts work, working one-on-one with agencies to identify processes that fit within current operations, and researching available databases that enable unique headcounts.

- 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**

- 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)

Feedback received from:

- Survey sent to executive directors on selected questions from the state plan;
- Seven in-person agency site visits conducted since October 2021;
- Monthly office hours conducted with network executive directors;
- Training satisfaction feedback collected from attendees; and
- Ad hoc conversations with agency staff as encountered.

### 3.3b. Analysis of local-level tools

- Eligible Entity Community Needs Assessments
- Eligible Entity Community Action Plans
- Public Hearings/Workshops
- Tools Not Identified Above (e.g., state required reports) [specify]

### 3.3c. Consultation with

- 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 (NCAP)
- 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.

By a survey sent on 7/7/2022, with a response deadline of 7/18/2022, IHCD asked Eligible Entities to review and provide feedback on five specific goals and other drafted responses to selected State Plan questions. (Survey link: <https://www.surveymonkey.com/r/2023-2024StatePlanCAASurvey>). Based on feedback received from 16 of the 22 agencies, the plan was revised and posted to the IHCD website on 7/29/2022. Executive Directors and CSBG Managers were notified of this, and that the virtual combined public/legislative hearing, with access information, had been scheduled for 8/22/2022. They, along with Indiana's state legislators and the general public, were invited to join that hearing and submit any additional comments on the plan via email by 8/24/2022.

#### 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) 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. [Narrative, 3000 Characters]

Following the precedent set by the Indiana CSBG team for the last state plan, selected questions from the state plan were identified where network input would be most beneficial. The drafted goals were specifically based on feedback received from the network as outlined in question 3.3a above. Feedback received on the suggested goals and the other questions offered for review were incorporated into the

final responses to this state plan. The network was also invited to the public/legislative hearing that was held on 8/22/2022.

- 3.5. Eligible Entity Overall Satisfaction:** Provide the state’s target for eligible entity Overall Satisfaction during the performance period. **Year One: 60 Year Two: 60**

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## 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 Act.
- Will be finalized after public comment period.
- 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.
- Will be finalized after public comment period.
- 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 Act.
- Will be finalized after public comment period.
- 4.4.** Attach supporting documentation or a hyperlink for the public and legislative hearings. Provide Public Notice Link here. Create Zip with: Public Notice, Teams attendance, script, etc.
- Will be finalized after public comment period.

## SECTION 5: CSBG Eligible Entities

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

<b>CSBG Eligible Entity</b>	<b>Geographical Area Served (by county) [Provide all counties]</b>	<b>Public or Nonprofit</b>	<b>Type of Entity [Choose all that apply]</b>
<u>Area IV Agency on Aging and Community Programs, Inc</u>	<u>Carroll, Clinton, Tippecanoe, White</u>	<u>Nonprofit</u>	<u>Community Action Agency</u>
<u>Area Five Agency on Aging and Community Services, Inc.</u>	<u>Cass, Howard, Miami, Tipton, Wabash</u>	<u>Nonprofit</u>	<u>Community Action Agency</u>
<u>Community Action of Greater Indianapolis, Inc.</u>	<u>Boone, Hamilton, Hendricks, Marion</u>	<u>Nonprofit</u>	<u>Community Action Agency</u>
<u>Community Action of Northeast Indiana, Inc.</u>	<u>Allen, DeKalb, LaGrange, Noble, Steuben, Whitley</u>	<u>Nonprofit</u>	<u>Community Action Agency</u>
<u>Community Action Program of Evansville and Vanderburgh County, Inc.</u>	<u>Gibson, Posey, Vanderburg</u>	<u>Nonprofit</u>	<u>Community Action Agency</u>
<u>Community Action of Southern Indiana, Inc.</u>	<u>Clark, Floyd, Harrison</u>	<u>Nonprofit</u>	<u>Community Action Agency</u>
<u>Community and Family Services, Inc.</u>	<u>Adams, Blackford, Huntington, Jay, Randolph, Wells</u>	<u>Nonprofit</u>	<u>Community Action Agency</u>
<u>Community Action Program, Inc. of Western Indiana</u>	<u>Benton, Fountain, Montgomery, Parke, Vermillion, Warren</u>	<u>Nonprofit</u>	<u>Community Action Agency</u>
<u>Human Services, Inc.</u>	<u>Bartholomew, Decatur, Jackson, Johnson, Shelby</u>	<u>Nonprofit</u>	<u>Community Action Agency</u>
<u>Hoosier Uplands Economic Development Corp.</u>	<u>Lawrence, Martin, Orange, Washington</u>	<u>Nonprofit</u>	<u>Community Action Agency</u>
<u>Interlocal Community Action Program, Inc.</u>	<u>Delaware, Fayette, Hancock, Henry, Rush, Wayne</u>	<u>Nonprofit</u>	<u>Community Action Agency</u>
<u>Job Source – Central Indiana Community Action Program</u>	<u>Grant, Madison</u>	<u>Public</u>	<u>Community Action Agency</u>

<u>Lincoln Hills Development Corporation</u>	<u>Crawford, Perry, Spencer</u>	<u>Nonprofit</u>	<u>Community Action Agency</u>
<u>North Central Community Action Agencies, Inc.</u>	<u>LaPorte, Pulaski, Starke</u>	<u>Nonprofit</u>	<u>Community Action Agency</u>
<u>Northwest Indiana Community Action Corp.</u>	<u>Jasper, Lake, Newton, Porter</u>	<u>Nonprofit</u>	<u>Community Action Agency</u>
<u>Ohio Valley Opportunities Inc.</u>	<u>Jefferson, Jennings, Scott</u>	<u>Nonprofit</u>	<u>Community Action Agency</u>
<u>PACE Community Action Agency, Inc.</u>	<u>Daviess, Greene, Knox, Sullivan</u>	<u>Nonprofit</u>	<u>Community Action Agency</u>
<u>REAL Services, Inc.</u>	<u>Elkhart, Fulton, Kosciusko, Marshall, St. Joseph</u>	<u>Nonprofit</u>	<u>Community Action Agency</u>
<u>South Central Community Action Program, Inc.</u>	<u>Brown, Monroe, Morgan, Owen</u>	<u>Nonprofit</u>	<u>Community Action Agency</u>
<u>Southeastern Indiana Economic Opportunity Corp.</u>	<u>Dearborn, Franklin, Ohio, Ripley, Switzerland, Union</u>	<u>Nonprofit</u>	<u>Community Action Agency</u>
<u>Dubois-Pike-Warrick Economic Opportunity</u>	<u>Dubois, Pike, Warrick</u>	<u>Nonprofit</u>	<u>Community Action Agency</u>
<u>Western Indiana Community Action Agency, Inc.</u>	<u>Clay, Putnam, Vigo</u>	<u>Nonprofit</u>	<u>Community Action Agency</u>

**5.2.** Total number of CSBG eligible entities: 22

**5.3. Changes to Eligible Entities List:** Within the tables below, describe any changes that have occurred to the eligible entities within the state since the last federal fiscal Year (FFY), as applicable.

One or more of the following changes were made to the eligible entity list:

- Designation and/or Re-Designation
- De-Designations 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 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.

CSBG Eligible Entity	Type	Start Date	Geographical Area Served
N/A	Choose an item.	Click or tap to enter a date.	

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

CSBG Eligible Entity	Reason
N/A	Choose an item.

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

Original CSBG Eligible Entities	Surviving CSBG Eligible Entity	New Name (as applicable)	DUNS No.
N/A	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.

## SECTION 6: Organizational Standards for Eligible Entities

**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 year(s) 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 FFY of this planning period including the rationale.

Indiana uses the 58 COE-developed organizational standards as the foundation for our monitoring criteria. In addition, Indiana has added 44 operational and fiscal state/pass-through standards that reflect requirements in both federal and state legislation, State Office policies, and our CSBG Grant Agreement (contract) provisions. Refer to the 2020 CSBG CAR Monitoring Tool ([https://www.in.gov/ihcda/files/Indiana-2020-CSBG-CAR-Tool\\_covers-added.pdf](https://www.in.gov/ihcda/files/Indiana-2020-CSBG-CAR-Tool_covers-added.pdf)) for the full list and explanations of the federal and state/pass-through standards that IHCD monitors.

**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

- There were no changes from the previous State Plan submission

Provide reason for using alternative standards: N/A

Describe rigor compared to COE-developed Standards: N/A

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

- Regulation
- Policy
- Contracts with Eligible Entities
- Other, describe:

**6.3. Organizational Standards Assessment:** Describe how the state will assess eligible entities against organizational standards this federal fiscal year(s).

- Peer-to-Peer Review (with validation by the state or state-authorized third party)
- Self-Assessment (with validation by the state or state-authorized third party)
- Self-Assessment/Peer Review with State Risk Analysis
- State-Authorized Third-Party Validation
- Regular On-Site CSBG monitoring
- Other

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

Indiana conducts a CSBG Comprehensive Administrative Review (CAR) monitoring at a minimum of every three years for each of the CAAs. Indiana utilizes a CAR Monitoring Tool that includes the CSBG organizational standards as well as state/pass-through standards that each CAA is reviewed against. Any Additional monitoring reviews that are needed or required as a result of special CSBG funding allocations, such as for natural disaster or emergency, are completed as needed. Each monitoring begins with an Entrance Conference for agency leadership staff outlining the monitoring event. Later, additional interviews are conducted with governing board members and agency leadership staff such as the Executive Director, Finance Manager, Human Resource Manager and CSBG Manager. Exit conferences are held with Executive Director and appropriate leadership staff to inform them of the preliminary results including required actions and best practice recommendations. This concludes the compliance monitoring phase of the monitoring event. A CSBG CAR Monitoring Report is distributed within 30 calendar days from the exit conference. It contains the monitoring results as well as identifies which organizational standards were met and provides an overall organizational standard score. The agencies are given 10 calendar days to respond by either accepting or informally appealing the report. If an agreement is not reached, then the agency can formally appeal items contained within the report. Once all items have been agreed upon, the agency will make corrective action to the identified deficiencies. IHCDAs makes every effort to work with CAAs in the event there are challenges with responding to the identified deficiencies. If a response is received that is incomplete or unacceptable, a letter is sent outlining the unacceptable portions and providing detailed guidance to complete their response. Agencies are also annually monitored through the information submitted in their CSBG Community Action Annual Plan, which includes an organizational standard self-assessment. Furthermore, an annual risk assessment is conducted that may result in interim monitoring's if a high risk is determined. Other major program reviews are also conducted within IHCDAs Community Programs Division, to assess the status of the agency's administration of those programs. The results of those reviews, in conjunction with the risk assessment, may trigger an interim monitoring such as a desktop review. No peer review is conducted, unless opted into by the CAA. When a new agency is designated, IHCDAs will conduct an onsite review at the end of the entity's first year of service. An agency that hires a new executive director may also receive some form of review at the end of their first year of service if a normal review is not scheduled. Follow-up reviews including progress updates and/or return visits occur, when appropriate, if there is less than favorable progress towards achieving compliance in outcomes or goals established during the onsite visit. Other reviews are conducted, as appropriate, including reviews of CAAs with programs that have had other federal, state or local grants terminated. If IHCDAs implements any material procedure changes to our monitoring plan, we will submit a State Plan revision.

**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)? 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. Total Number of Exempt Entities:

CSBG Eligible Entity	Description/Justification
<u>N/A</u>	

**6.5. Performance Target:** Provide the percentage of eligible entities that the state expects to meet all the state-adopted organizational standards for the FFY(s) of this planning period. **Year One** 35 % **Year Two** 40 %

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## 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.

- Historic
- Base + Formula
- Formula Alone
- Formula with Variables
- Hold Harmless + Formula
- Other

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

For the upcoming year, Indiana is updating its funding formula to address two issues: 1) new census data (the base information for our formula) has been released from the US Census Bureau, and 2) the Community Action Network in Indiana requested we put a \$200,000 “floor” into our formula to ensure no eligible entities receive too low an allocation. Besides those two changes, Indiana’s allocation is determined the same way it has been in the past, taking into account a base allocation for each agency, the number of counties the agency serves, and the percentage of individuals living at/below 125% FPL in the agency’s region. This new allocation table will be reviewed for approval by the IHCD Board of Directors in August 2022.

**7.1b. Statute:** Does a state statutory or regulatory authority specify the formula for allocating “not less than 90 percent” funds among eligible entities? 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 year(s) covered by this plan.      **Year One** 90%      **Year Two** 90%

#### Planned CSBG 90 Percent Funds – Year One

CSBG Eligible Entity	Funding Amount (\$)
Area IV Agency on Aging and Community Programs, Inc.	439,609.59
Area Five Agency on Aging and Community Services, Inc.	370,041.67
Community Action of Greater Indianapolis, Inc.	1,519,914.62
Community Action of Northeast Indiana, Inc.	700,454.81
Community Action Program of Evansville and Vanderburgh County, Inc.	378,049.84
Community Action of Southern Indiana, Inc.	305,625.40

Community and Family Services, Inc.	354,822.04
Community Action Program of Western Indiana	295,582.29
Human Services, Inc.	438,721.88
Hoosier Uplands Economic Development Corp.	246,650.89
Interlocal Community Action Program, Inc.	572,363.61
JobSource-Central Indiana Community Action Program	329,669.07
Lincoln Hills Development Corporation	200,062.88
North Central Community Action Agencies, Inc.	279,124.76
Northwest Indiana Community Action Corp.	835,572.46
Ohio Valley Opportunities, Inc.	208,777.91
PACE Community Action Agency, Inc.	273,796.50
REAL Services, Inc.	760,068.58
South Central Community Action Program, Inc.	419,935.30
Southeastern Indiana Economic Opportunity Corp.	296,050.32
Dubois-Pike-Warren Economic Opportunity	220,621.86
Western Indiana Community Action Agency, Inc.	311,755.43
<b>Total (Auto-calculated)</b>	<b>\$ 9,757,271.71</b>

**Planned CSBG 90 Percent Funds – Year Two**

<b>CSBG Eligible Entity</b>	<b>Funding Amount (\$)</b>
Area IV Agency on Aging and Community Programs, Inc.	439,609.59
Area Five Agency on Aging and Community Services, Inc.	370,041.67
Community Action of Greater Indianapolis, Inc.	1,519,914.62
Community Action of Northeast Indiana, Inc.	700,454.81
Community Action Program of Evansville and Vanderburgh County, Inc.	378,049.84
Community Action of Southern Indiana, Inc.	305,625.40
Community and Family Services, Inc.	354,822.04
Community Action Program of Western Indiana	295,582.29
Human Services, Inc.	438,721.88
Hoosier Uplands Economic Development Corp.	246,650.89
Interlocal Community Action Program, Inc.	572,363.61
JobSource-Central Indiana Community Action Program	329,669.07
Lincoln Hills Development Corporation	200,062.88

CSBG Eligible Entity	Funding Amount (\$)
North Central Community Action Agencies, Inc.	279,124.76
Northwest Indiana Community Action Corp.	835,572.46
Ohio Valley Opportunities, Inc.	208,777.91
PACE Community Action Agency, Inc	273,796.50
REAL Services, Inc.	760,068.58
South Central Community Action Program, Inc.	419,935.30
Southeastern Indiana Economic Opportunity Corp.	296,050.32
Dubois-Pike-Warren Economic Opportunity	220,621.86
Western Indiana Community Action Agency, Inc.	311,755.43
<b>Total (Auto-calculated)</b>	<b>\$ 9,757,271.71</b>

**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).

During 2023/2024 program years, the Community Services Block Grant funds will be allocated as follows: CAAs receive 90%, the State Office Administration allocation is 5%, and the remaining 5% is used for discretionary purposes. Step 1 (1 day): Once the award letter is received from HHS, the CSBG Program Manager runs the total amount through an allocation table, which determines the 90%, 5% and 5% amounts. Using the 90% amount, the table then calculates the amount each CAA receives, using the formula described above. Step 2 (1 day): The CSBG Manager and Chief Deputy Director of Programs perform a quality assurance review of the amounts calculated. Step 3 (3 days): the final amounts are emailed to IHCDAs Executive Director, to approve disbursement. Step 4 (1 week): Once approval is received from IHCDAs Executive Director, the Manager finalizes the award for each agency and sends via email (AdobeSign) for e-signatures.

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

- Reimbursement
- Advance
- Hybrid
- Other

**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? No

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

While IHCDAs usually receive CSBG funds from HHS in the fall of the federal fiscal year, in Indiana, the CSBG program year does not start until the following January 1. When IHCDAs receive those funds, program staff immediately create and send contracts to eligible agencies, and those contracts are normally finalized within 30 days of IHCDAs receiving funds from HHS. However, those contracts do not

start until January 1 of the state program year, which can be one to three months after the funds are originally received. Despite this delay in the contract starting, agencies still have access to each round of funding for 12 months before the next round of funding is available. Because Indiana still follows a 12-month cycle (with carryover allowed until the end of the next fiscal year), there is no interruption in funding. We would work with agencies if they ran out of funds prior to January 1, but this has not occurred. After January 1, any CSBG funds received from HHS are made immediately available to agencies.

**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 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.

Changes have been made in the recent past to ease the budget process with excellent results. Currently, IHCD has plans to meet with agency designees to identify “pain points” in our claims process; we will make adjustments as much as possible based on that discussion.

**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 FFY(s) covered by this State Plan.

**Year One** 5 % **Year Two** 5 %

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

**Year One** 44 **Year Two** 44

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

**Year One** 5 **Year Two** 5

**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

If yes, provide the allocated percentage and describe the use of the remainder/discretionary funds in the table below. **Year One** 5 % **Year Two** 5 %

**Use of Remainder/Discretionary Funds – Year One**

Remainder/Discretionary Fund Uses (See 675C(b)(1) of the CSBG Act)	Planned \$	Brief Description of Services and/or Activities
7.9a. <u>Training/Technical Assistance to eligible entities</u>	<u>\$292,071</u>	These planned services/activities will be described in State Plan Item 8.1 [Read-Only]
7.9b. Coordination of state-operated programs and/or local programs	\$0	These planned services/activities will be described in State Plan Section 9,

Remainder/Discretionary Fund Uses (See 675C(b)(1) of the CSBG Act)	Planned \$	Brief Description of Services and/or Activities
		State Linkages and Communication [Read-Only]
7.9c. Statewide coordination and communication among eligible entities	\$0	These planned services/activities will be described in State Plan Section 9, State Linkages and Communication [Read-Only]
7.9d. Analysis of distribution of CSBG funds to determine if targeting greatest need (Briefly describe under Column 4)	\$0	
7.9e. Asset-building programs (Briefly describe under Column 4)	\$0	
7.9f. <u>Innovation programs/activities by eligible entities or other neighborhood groups</u> (Briefly describe under Column 4)	<u>\$250,000</u>	<u>\$150,000 CAA Impact Grants</u> <u>\$80,000 Agency Impact Grants</u> <u>\$20,000 Homeless Point-in-Time (PIT) Count</u>
7.9g. State Charity tax credits (Briefly describe under Column 4)	\$0	
7.9h. Other activities (Specify these other activities under Column 4)	\$0	
<b>Totals (Auto-Calculated)</b>	<b>\$ 542,071.00</b>	

**Use of Remainder/Discretionary Funds – Year Two**

Remainder/Discretionary Fund Uses (See 675C(b)(1) of the CSBG Act)	Planned \$	Brief Description of Services and/or Activities
7.9a. <u>Training/Technical Assistance to eligible entities</u>	<u>\$292,071</u>	These planned services/activities will be described in State Plan Item 8.1 [Read-Only]
7.9b. Coordination of state-operated programs and/or local programs	\$0	These planned services/activities will be described in State Plan Section 9, State Linkages and Communication [Read-Only]
7.9c. Statewide coordination and communication among eligible entities	\$0	These planned services/activities will be described in State Plan Section 9, State Linkages and Communication [Read-Only]
7.9d. Analysis of distribution of CSBG funds to determine if targeting greatest need (Briefly describe under Column 4)	\$0	
7.9e. Asset-building programs (Briefly describe under Column 4)	\$0	
7.9f. <u>Innovation programs/activities by eligible entities or other neighborhood groups</u> (Briefly describe under Column 4)	<u>\$250,000</u>	<u>\$150,000 CAA Impact Grants</u> <u>\$80,000 Agency Impact Grants</u> <u>\$20,000 Homeless Point-in-Time (PIT) Count</u>
7.9g. State Charity tax credits (Briefly describe under Column 4)	\$0	
7.9h. Other activities (Specify these other activities under Column 4)	\$0	Homeless Point-in-Time (PIT) Count

Remainder/Discretionary Fund Uses (See 675C(b)(1) of the CSBG Act)	Planned \$	Brief Description of Services and/or Activities
<b>Totals (Auto-Calculated)</b>	<b>\$ 542,071.00</b>	

**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 the activities in Table 7.9.

- The State Directly Carries Out All Activities (No Partnerships)
- The State Partially Carries Out Some Activities
- CSBG Eligible Entities (if checked, include the expected number of CSBG eligible entities to receive funds) 22
- 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

**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. [Narrative, 4000 characters]

Building on their success in 2021, IHCD will continue to set aside a specific amount of training and technical assistance funds for agencies to use post-monitoring, helping them address identified organizational standard deficiencies. In 2022, specific effort was made by IHCD and the State Association to bring CAA staff cohorts (e.g., executive directors) together in round table sessions to discuss common topics and exchange best practices. The network also requested we put more money toward organization-specific staff training which was done. IHCD also offers Impact Grants to agencies who are working not on eliminating deficiencies, but rather on taking their organization to the next level to improve their internal operations. The network has also asked IHCD to support more peer-to-peer consultations and trainings, allowing lower-performing agencies to learn from higher-performing ones, along with utilizing agency leaders with proven expertise in certain areas.

## 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-funded T/TA activities funded through the administrative or remainder/discretionary funds of the 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 – Year One

Planned Timeframe	Training, Technical Assistance, or Both	Topic	Brief Description of “Other”
<u>FY1 Q1</u>	<u>Training</u>	<u>Monitoring</u>	<u>New 2023 CAR Tool rollout</u>
<u>Ongoing/Multiple Quarters</u>	<u>Technical Assistance</u>	<u>Correcting Significant Deficiencies Among Eligible Entities</u>	<u>Post-monitoring</u>
<u>Ongoing/Multiple Quarters</u>	<u>Training</u>	<u>Other</u>	<u>Funds for customized staff training.</u>
<u>Ongoing/Multiple Quarters</u>	<u>Both</u>	<u>Other</u>	<u>Round tables for HR, etc., INCAA membership support</u>
<u>Ongoing/Multiple Quarters</u>	<u>Training</u>	<u>Other</u>	<u>Some combination of topics as outlined in the annual training contract(s). (TPMA)</u>
<u>Ongoing/Multiple Quarters</u>	<u>Technical Assistance</u>	<u>Other</u>	<u>Ad hoc T/TA for acute agency issues for which they need support.</u>
<u>Ongoing/Multiple Quarters</u>	<u>Training</u>	<u>Other</u>	<u>Implement cohort model of training, e.g., linking together new Exec Directors, new CFOs, etc.</u>
<u>Ongoing/Multiple Quarters</u>	<u>Technical Assistance</u>	<u>Communication</u>	<u>Monthly office hours with Exec Directors, and in-person site visits by CSBG Manager.</u>

### Training and Technical Assistance – Year Two

Planned Timeframe	Training, Technical Assistance, or Both	Topic	Brief Description of “Other”
<u>Ongoing/Multiple Quarters</u>	<u>Technical Assistance</u>	<u>Correcting Significant Deficiencies Among Eligible Entities</u>	<u>Post-monitoring</u>
<u>Ongoing/Multiple Quarters</u>	<u>Training</u>	<u>Other</u>	<u>Funds for customized staff training.</u>
<u>Ongoing/Multiple Quarters</u>	<u>Both</u>	<u>Other</u>	<u>Round tables for HR, etc., INCAA membership support</u>

<u>Ongoing/Multiple Quarters</u>	<u>Training</u>	<u>Other</u>	<u>Some combination of topics as outlined in the annual training contract(s).</u>
<u>Ongoing/Multiple Quarters</u>	<u>Technical Assistance</u>	<u>Other</u>	<u>Ad hoc T/TA for acute agency issues for which they need support.</u>
<u>Ongoing/Multiple Quarters</u>	<u>Training</u>	<u>Other</u>	<u>Continue cohort model of training, e.g., linking together new Exec Directors, new CFOs, etc.</u>
<u>Ongoing/Multiple Quarters</u>	<u>Technical Assistance</u>	<u>Communication</u>	<u>Monthly office hours with Exec Directors, and in-person site visits by CSBG Manager.</u>

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

**Year One** \$354,989 **Year Two** \$354,989

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

As a part of the annual Community Action Plan, agencies suggest topics for trainings that IHCD should host or fund. That list of topics is used along with feedback that the State Association gathers from individual agencies and committees, and from monitoring results, to plan a series of trainings each year, delivered by IHCD, INCAA and other consultants, including national partners (NASCS, CAPLAW, Wipfli, etc.). IHCD will work more closely with other state departments to provide training and technical assistance on relevant state programs and on how to form linkages with other state-funded entities. Indiana’s Eligible Entities have specifically requested hearing from the Indiana Department of Health, the Indiana Department of Workforce Development, , and other economic development organizations.

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

**8.2a. Address Unmet Organizational Standards:** Describe the state’s plan to provide T/TA to eligible entities to ensure they address unmet Organizational Standards.

Each year, IHCD uses CSBG discretionary funds to provide trainings for the entire network; many of the training topics are inspired by trends in monitoring, specifically by commonly unmet organizational standards. Often, by attending those trainings and updating documents or policies that are covered by the trainings, agencies can show that they have addressed the unmet standard. For anything that is not covered by a statewide training, the CSBG Program Manager works directly with each agency to ensure they complete and return necessary documents to show that they have addressed unmet standards; this is done via monthly phone calls and regular emails, until the manager determines the standard is met. All monitored agencies are offered additional T/TA funding to address any unmet Organizational Standards or other identified deficiencies.

**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 T/TA 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

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

CAAs often request training or additional assistance on CSBG-specific reporting or monitoring. For example, in 2022, more training on the CSBG Annual Report was requested; IHEDA brought NASCSP to Indianapolis to conduct a 2-day training as part of the state association's annual conference. In 2023, with the release of the new CAR Monitoring Tool, a training will be held to facilitate its use. As noted previously, IHEDA is also targeting specific agency roles (e.g., executive directors, CFOs) and is contracting with expert consultants to build cohorts who can remain connected beyond their training. CAAs have also requested hearing from other state-level agencies and other organizations with similar missions, to learn more about programs that could benefit their communities. With the continued partnership of our state association and an independent contractor, trainings will continue on topics that are routine (representing common issues seen by eligible entities) and for areas where the state may see a need (how to collect a unique head count, optimal messaging to the public).

## SECTION 9: State Linkages and Communication

**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)). Describe additional information as needed.

- State Low Income Home Energy Assistance Program (LIHEAP) office
- State Weatherization office
- State Temporary Assistance for Needy Families (TANF) office
- Head Start State Collaboration offices
- 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: Indiana Office of Medicaid Services (for traditional/ACA expansion, and Children's Health Insurance Program)

**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 Section 676(b)(5) – (6)).

IHCDA stands ready to connect eligible entities with related state agencies and other organizations with similar missions as needed and/or as requested. Toward this goal, in 2022, the CSBG Manager engaged with two such organizations: the Indiana University Center for Rural Engagement, and the Indiana Rural Health Association. Because every one of Indiana's 22 community action agencies include rural counties in their service areas, it is imperative that connections from such rural-focused programs be made. Accordingly, in 2023/2024, IHCDA plans to explore to increase awareness about community action in Indiana and how the network can benefit those living in extreme rural areas. In addition, as the public health emergency winds down, many network clients may lose health coverage. The CSBG Manager has joined a task force aimed at ensuring those enrolled in Indiana's health coverage programs are not dropped. Communication on this effort will continue to the network. Chief Deputy regularly attends meetings with other community partners to raise awareness of CAA in their communities.

**9.3. Eligible Entity Linkages and Coordination**

**9.3a. State Assurance of Eligible Entity Linkages and Coordination:** Describe how the state will assure that 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)).

As a part of the annual Community Action Plan, eligible entities must list and describe the partnerships they form in their communities, as well as the linkages they develop or maintain to address service gaps and to avoid duplication of services. IHEDA reviews each Action Plan, and if an explanation is deemed insufficient, requests additional information from the relevant eligible entity. Partnerships and linkages are also reviewed during onsite monitoring reviews; if any major gaps appear in those linkages, IHEDA will work with an agency to develop new or more robust linkages.

- 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.

CSBG Eligible Entities rely on their triennial community needs assessment and strategic planning processes to identify and fill service gaps. Based on these, agencies develop new and/or strengthen current linkages between their own programs and those provided by other local organizations. Agencies maintain regular communication with key stakeholders, frequently sit on their boards and coalitions, and use ongoing feedback from those stakeholders to regularly evaluate and respond to gaps in community services. Many agencies use a Family Development Matrix (or similar) tool to measure different areas of need for each client, and to connect that client with relevant resources and programs to meet those needs. These tools are often used in conjunction with case management or coaching. Finally, most agencies maintain a service referral handout to help clients identify additional services within the agency or elsewhere.

- 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)?  
No

- 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.

These efforts in coordination of employment and training activities will be carried out by local agreements between the Community Action Agencies and the local Workforce

Development Boards. IHCD is available to the Community Action Agencies for assistance in these negotiations.

- 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 Program) are conducted in each community in the State, as required by the assurance under Section 676(b)(6) of the CSBG Act).

IHCD administers The Low-Income Home Energy Assistance Program (LIHEAP) in Indiana. Funding is provided to local service providers (LSPs) for provision of both the Energy Assistance program (EAP) and the LIHEAP portion of the Weatherization Program (Wx); 20 of Indiana's 22 CSBG Eligible Entities administer the EAP program and a slightly different 20 administer the Wx program. EAP services include winter assistance and crisis benefits for heating, as well as leveraging when available. These agencies serve all 92 counties within the state. The LSPs work closely with utility companies and private vendors to serve those in need of energy assistance.

- 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.

As a part of the annual Community Action Plan, eligible entities must list and describe the partnerships they form in their communities and indicate if those partnerships are with faith-based organizations, charitable groups, or community organizations. IHCD reviews each Action Plan, and if an explanation is deemed insufficient, requests additional information from the relevant eligible entity. Partnerships and linkages are also reviewed during onsite monitoring reviews.

- 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.

Most CSBG Eligible Entities combine CSBG funds with other federal, state and local funding to support their services. Many agencies also solicit private donations and in-kind services for further funding support. In a few cases, agencies subgrant CSBG funds to local partners who are able to provide certain services with either greater efficiency and/or at greater capacity than the agency could with their own available resources.

- 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.

All of Indiana's CAAs are eligible to be members of the Indiana Community Action Association (INCAA). INCAA receives CSBG discretionary funding from IHCD to provide technical assistance, training, and resources to help CAAs increase network capacity. These resources must be made available to all CAAs that receive CSBG funds from IHCD, even if they choose not to be an INCAA member.

- 9.9. Communication with Eligible Entities and the State Community Action Association:** In the table below, detail how the state intends to communicate with eligible entities, the

State Community Action Association, and other partners identified under this State Plan on the topics listed below.

**Communication Plan**

Subject Matter	Expected Frequency	Format	Brief Description of "Other"
<u>Upcoming Public and/or Legislative Hearings</u>	<u>As needed</u>	<u>Other</u>	<u>Email, website, public notice, monthly office hours, (non-monitoring) site visits.</u>
<u>State Plan Development</u>	<u>Biannual</u>	<u>Choose an item.</u>	<u>Email, website, public notice, monthly office hours, (non-monitoring) site visits.</u>
<u>Organizational Standards Progress</u>	<u>Annually</u>	<u>Choose an item.</u>	<u>Meetings, webinar, monitoring review</u>
<u>State Accountability Measures Progress</u>	<u>Biannual</u>	<u>Choose an item.</u>	<u>Meetings/Presentation, email, webinar</u>
<u>Community Needs Assessments/Community Action Plans</u>	<u>Upon Request</u>	<u>Choose an item.</u>	<u>Email and/or regular meetings</u>
<u>State Monitoring Plans and Policies</u>	<u>Annually</u>	<u>Choose an item.</u>	<u>Email, website, monthly office hours, (non-monitoring) site visits.</u>
<u>Training and Technical Assistance (T/TA) Plans</u>	<u>Biannual</u>	<u>Choose an item.</u>	<u>Email, public notice, monthly office hours, (non-monitoring) site visits.</u>
<u>ROMA and Performance Management</u>	<u>As needed</u>	<u>Choose an item.</u>	<u>Email, website, public notice, monthly office hours, (non-monitoring) site visits.</u>
<u>State Interagency Coordination</u>	<u>As needed</u>	<u>Choose an item.</u>	<u>Email, website, public notice, monthly office hours, (non-monitoring) site visits.</u>
<u>CSBG Legislative/Programmatic Updates</u>	<u>As needed</u>	<u>Choose an item.</u>	<u>Email, website, public notice, monthly office hours, (non-monitoring) site visits.</u>
<u>Tripartite Board Requirements</u>	<u>As needed</u>	<u>Choose an item.</u>	<u>Email, website, public notice, monthly office hours, (non-monitoring) site visits.</u>
<u>Click or tap here to enter text.</u>	<u>As needed</u>	<u>Choose an item.</u>	<u>Email, website, public notice, monthly office hours, (non-monitoring) site visits.</u>

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

Feedback from the State Accountability Measures will be emailed to the Executive Directors of CAAs within 30 days of receiving the report. In addition, IHCD attends all monthly INCAA Board Meetings and will provide additional updates and request additional feedback in that forum. IHCD also holds monthly office hours calls for the network and state association where updates and new information are shared; time for Q&A is provided. Finally, the CSBG Manager is making in-person site visits to the network where she learns about special projects underway by agency, and where can also share updates.

**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 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.

IHCDA’s Chief Deputy Director of Programs meets with the Executive Director of INCAA on a weekly basis. This, combined with monthly “office hours” open to the INCAA Executive Director and network leadership, provide an excellent opportunity to keep eligible entities updated with relevant information. In 2022, the CSBG Manager initiated “good will” site visits to the network, to meet the agencies, learn about their important work, and to also communicate any relevant information from the state office. The IHCDA website is very comprehensive, and the network knows to check there for the latest information and guidance to help direct their work. In 2022, the CSBG Manual was updated and posted to the partners’ website. In 2023, the revised CAR Monitoring Tool will also be posted on the website; it will have a corresponding training on significant changes.

DRAFT

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

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

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

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

**Monitoring Schedule – Year One**

<b>CSBG Eligible Entity</b>	<b>Monitoring Type</b>	<b>Review Type</b>	<b>Target Quarter</b>	<b>Start Date of Last Full Onsite Review</b>	<b>End Date of Last Full Onsite Review</b>	<b>Brief Description of “Other”</b>
<u>Area IV</u>	<u>No Review</u>	Choose an item.	Choose an item.	Click or tap to enter a date.	Click or tap to enter a date.	
<u>Area Five</u>	<u>Full On-Site</u>	<u>Onsite</u>	<u>FY1 Q4</u>	<u>10/5/2020</u>	<u>7/15/2021</u>	
<u>CAGI</u>	<u>Full On-Site</u>	<u>Onsite</u>	<u>FY1 Q3</u>	<u>4/28/2020</u>	<u>7/21/2021</u>	
<u>CANI</u>	<u>No Review</u>	Choose an item.	Choose an item.	Click or tap to enter a date.	Click or tap to enter a date.	
<u>CAPE</u>	<u>No Review</u>	Choose an item.	Choose an item.	Click or tap to enter a date.	Click or tap to enter a date.	
<u>CAPWI</u>	<u>Other</u>	<u>Desk Review</u>	<u>FY1 Q2</u>	<u>5/11/2021</u>	<u>9/16/2021</u>	<u>New ED</u>
<u>CASI</u>	<u>No Review</u>	Choose an item.	Choose an item.	Click or tap to enter a date.	Click or tap to enter a date.	
<u>CFS</u>	<u>Full On-Site</u>	<u>Onsite</u>	<u>FY1 Q3</u>	<u>6/8/2021</u>	<u>10/21/2021</u>	
<u>HSI</u>	<u>No Review</u>	Choose an item.	Choose an item.	Click or tap to enter a date.	Click or tap to enter a date.	
<u>HUEDC</u>	<u>No Review</u>	Choose an item.	Choose an item.	Click or tap to enter a date.	Click or tap to enter a date.	
<u>ICAP</u>	<u>Full On-Site</u>	<u>Onsite</u>	<u>FY1 Q4</u>	<u>9/22/2020</u>	<u>8/4/2021</u>	
<u>JobSource</u>	<u>Full On-Site</u>	<u>Onsite</u>	<u>FY1 Q4</u>	<u>6/23/2020</u>	<u>7/27/2021</u>	
<u>LHDC</u>	<u>Full On-Site</u>	<u>Onsite</u>	<u>FY1 Q1</u>	<u>10/22/2019</u>	<u>11/18/2019</u>	
<u>NCCAA</u>	<u>No Review</u>	Choose an	Choose an	Click or tap	Click or tap	

		item.	item.	to enter a date.	to enter a date.	
<u>NWICA</u>	<u>No Review</u>	Choose an item.	Choose an item.	Click or tap to enter a date.	Click or tap to enter a date.	
<u>OVO</u>	<u>Full On-Site</u>	<u>Onsite</u>	<u>FY1 Q1</u>	<u>9/10/2019</u>	<u>11/1/2019</u>	
<u>PACE</u>	<u>No Review</u>	Choose an item.	Choose an item.	Click or tap to enter a date.	Click or tap to enter a date.	
<u>REAL</u>	<u>Other</u>	<u>Desk Review</u>	<u>FY1 Q2</u>	<u>6/29/2021</u>	<u>8/23/2021</u>	<u>New ED</u>
<u>SCCAP</u>	<u>Full On-Site</u>	<u>Onsite</u>	<u>FY1 Q3</u>	<u>5/19/2020</u>	<u>7/23/2021</u>	
<u>SIEOC</u>	<u>No Review</u>	Choose an item.	Choose an item.	Click or tap to enter a date.	Click or tap to enter a date.	
<u>TRI CAP</u>	<u>No Review</u>	Choose an item.	Choose an item.	Click or tap to enter a date.	Click or tap to enter a date.	
<u>WICAA</u>	<u>No Review</u>	Choose an item.	Choose an item.	Click or tap to enter a date.	Click or tap to enter a date.	

**Monitoring Schedule – Year Two**

<b>CSBG Eligible Entity</b>	<b>Monitoring Type</b>	<b>Review Type</b>	<b>Target Quarter</b>	<b>Start Date of Last Full Onsite Review</b>	<b>End Date of Last Full Onsite Review</b>	<b>Brief Description of "Other"</b>
<u>Area IV</u>	<u>No Review</u>	Choose an item.	Choose an item.	Click or tap to enter a date.	Click or tap to enter a date.	
<u>Area Five</u>	<u>No Review</u>	Choose an item.	Choose an item.	Click or tap to enter a date.	Click or tap to enter a date.	
<u>CAGI</u>	<u>No Review</u>	Choose an item.	Choose an item.	Click or tap to enter a date.	Click or tap to enter a date.	
<u>CANI</u>	<u>Full On-Site</u>	<u>Onsite</u>	<u>FY2 Q4</u>	<u>8/10/2021</u>	<u>10/5/2021</u>	
<u>CAPE</u>	<u>No Review</u>	Choose an item.	Choose an item.	Click or tap to enter a date.	Click or tap to enter a date.	
<u>CAPWI</u>	<u>Full On-Site</u>	<u>Onsite</u>	<u>FY2 Q3</u>	<u>5/11/2021</u>	<u>9/16/2021</u>	
<u>CASI</u>	<u>No Review</u>	Choose an	Choose an	Click or tap	Click or tap	

		item.	item.	to enter a date.	to enter a date.	
<u>CFS</u>	<u>No Review</u>	Choose an item.	Choose an item.	Click or tap to enter a date.	Click or tap to enter a date.	
<u>HSI</u>	<u>Full On-Site</u>	<u>Onsite</u>	<u>FY2 Q1</u>	<u>10/20/2020</u>	<u>8/26/2021</u>	
<u>HUEDC</u>	<u>No Review</u>	Choose an item.	Choose an item.	Click or tap to enter a date.	Click or tap to enter a date.	
<u>ICAP</u>	<u>No Review</u>	Choose an item.	Choose an item.	Click or tap to enter a date.	Click or tap to enter a date.	
<u>JobSource</u>	<u>No Review</u>	Choose an item.	Choose an item.	Click or tap to enter a date.	Click or tap to enter a date.	
<u>LHDC</u>	<u>No Review</u>	Choose an item.	Choose an item.	Click or tap to enter a date.	Click or tap to enter a date.	
<u>NCCAA</u>	<u>No Review</u>	Choose an item.	Choose an item.	Click or tap to enter a date.	Click or tap to enter a date.	
<u>NWICA</u>	<u>No Review</u>	Choose an item.	Choose an item.	Click or tap to enter a date.	Click or tap to enter a date.	
<u>OVO</u>	<u>No Review</u>	Choose an item.	Choose an item.	Click or tap to enter a date.	Click or tap to enter a date.	
<u>PACE</u>	<u>Full On-Site</u>	<u>Onsite</u>	<u>FY2 Q3</u>	<u>4/13/2021</u>	<u>5/28/2021</u>	
<u>REAL</u>	<u>Full On-Site</u>	<u>Onsite</u>	<u>FY2 Q3</u>	<u>6/29/2021</u>	<u>8/23/2021</u>	
<u>SCCAP</u>	<u>No Review</u>	Choose an item.	Choose an item.	Click or tap to enter a date.	Click or tap to enter a date.	
<u>SIEOC</u>	<u>Full On-Site</u>	<u>Onsite</u>	<u>FY2 Q4</u>	<u>9/7/2021</u>	<u>10/21/2021</u>	
<u>TRI CAP</u>	<u>No Review</u>	Choose an item.	Choose an item.	Click or tap to enter a date.	Click or tap to enter a date.	
<u>WICAA</u>	<u>Full On-Site</u>	Onsite	FY2 Q4	11/9/2021	12/17/2021	

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

[https://www.in.gov/ihcda/files/Indiana-2020-CSBG-CAR-Tool\\_covers-added.pdf](https://www.in.gov/ihcda/files/Indiana-2020-CSBG-CAR-Tool_covers-added.pdf)

**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? 30

### **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

**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. 2

**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 Office of Community Services (OCS) is notified within calendar 30 days of IHCDAs Division of Community Programs approving a community action agency's (CAA) quality improvement (corrective action) plan (QIP). OCS receives a copy of the IHCDAs CSBG CAR Monitoring Report, IHCDAs CAR Onsite Completion and Monitoring Closeout letter which provides the QIP eligibility notification to the CAA, IHCDAs official QIP notification, and the IHCDAs CSBG QIP Acceptance letter that begins the CAAs corrective action process. IHCDAs has briefed our CSBG Project Officer regarding the current QIP process.

**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

### **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

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

- IC 12-14-23-2 (3): An organization is designated as a community action agency by the governor or by federal law.
- IC 12-14-23-5: A community action agency may not receive state or federal money appropriated or allocated by the state to carry out community action programs unless the agency is organized in accordance with this chapter.

**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? 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 new eligible entities and how the procedures were made available to eligible entities and the public.

Indiana aligns with and follows the federal process for termination as provided by the OCS IM-116.

**10.10. Eligible Entity Re-Designation:** Do the state CSBG statute and/or regulations provide for re-designation of an existing eligible entity? 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 state procedures for re-designation of existing eligible entities and how the procedures were made available to eligible entities and the public.

There is currently no process for re-designation for the Community Action Agencies. CAAs remain in their status unless terminated, voluntarily relinquished, or ceased operations.

### **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).

Indiana Housing and Community Development Authority has fiscal control and accounting procedures necessary to assure the proper disbursement of and accounting for federal funds. The funding for each eligible entity is determined by IHCD using a funding formula. As a part of the contract process, IHCD's Community Programs Department reviews and approves a budget for each eligible entity, which projects the amounts to be expended for administrative and program activities; the amount an agency can spend on administrative costs is capped at a percentage provided in their contract. Those contracts and budgets are then entered into IHCD's claims system for tracking. IHCD's Financial Operations department is responsible for reviewing claims that are made against those budgets before funds are made available to the agency; the Community Programs Manager for CSBG and Community Programs Fiscal Monitor assists as necessary, especially when new guidance on allowable expenses has recently been posted. Claims can only be submitted on a reimbursement basis, using supporting documentation such as general ledgers and receipts; IHCD does not provide cash advances. Claims are also limited to the amounts set by the eligible entities budget; eligible entities cannot claim for more than they are allowed by their contract and budget. The Community Programs Fiscal Monitor joins the CSBG Program Monitor for on-site visits to review claims and further ensure funds have been used appropriately.

IHCDA assures that the cost and accounting standards of the Office of Management and Budget are accurately applied to IHCDA and the Sub-grantees that receive CSBG funding. IHCDA's Accounting Department maintains a separate bank account for CSBG monies and it has its own unique Chart of Accounts to record that specific programs activities. IHCDA prepares an individual balance sheet and income statement monthly for this program as well as consolidated statements for all IHCDA programs and activities. IHCDA uses an independent auditor who completes a program audit as well as a financial statement audit. Appropriate books, documents, papers and records are available to the Secretary and the Controller General of the United States or any authorized representatives to examine, copy or mechanically reproduce any and all related documents upon reasonable request for the items.

**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.

IHCDA has an Internal Auditor on staff to collect and review A-133 Single Audits. During that review, the Internal Auditor looks specifically at certain ratios to test the viability/stability of the recipient, the Independent Auditors Report, notes to the audited financial statements, SEFA, compliance Reports, Schedule of Findings and Questioned Costs, Reoccurring Financial Statement issues, findings specifically linked to IHCDA's programs and the Summary Schedule of Prior Audit Findings. If Findings are identified within the report that relate to CSBG or any other federal program that IHCDA subawards, a Management Decision Letter (MDL) may be issued, depending on the Findings and an agency's response; if an MDL is issued, it is within six-months of the audit report being accepted by the Federal Audit Clearinghouse. Any issued MDL will clearly state whether or not the audit finding is sustained, the reasons for the decision, and the expected auditee action to repay disallowed costs, make financial adjustments, or take other action. If the auditee has not completed corrective action, a timetable for follow-up should be given. The MDL will also describe any appeal process available to the auditee.

**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

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

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

Prior to implementing a revised monitoring tool, the Indiana network is provided a thirty-day comment period. The State of Indiana CAR monitoring process utilizes the CSBG Organizational Standards (IM-138), state and federal codes, IHCDA knowledge, previous monitoring experience, and best business practices. In addition, Indiana monitors fiscal management, performance metrics, allocation, procurement and accounting to determine solvency, all based on industry standards and best practices.

We also utilize an annual risk assessment where outcomes result in determining any additional requirements for monitoring. The State CSBG monitoring has implemented a scoring system so each agency receives an overall monitoring performance score. This accountability measure provides the ability to track data such as statewide performance, specific standards that are not met, and the percentage of eligible entities that met the organizational standards during the performance period. It also allows for IHCD to review how the agency meets state/pass through standards and implements their CSBG contractual obligations. The monitoring results are also the base information utilized for any Technical Assistance Plans and Quality Improvement Plans for eligible entities not meeting the standards during the performance period. Overall, Organizational Management and Organizational Analysis standards are designed to ensure CSBG eligible entities have appropriate organizational capacity to deliver services to low-income individuals in their communities. In December 2021, IHCD CSBG staff began a series of monthly conversations with a representative group of agency Executive Directors to review all existing standards, receive feedback, and collaboratively develop the CSBG CAR Tool that resulted from those conversations. This document will be published in January 2023.

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## 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.

- Attend Board meetings
- Organizational Standards Assessment
- Monitoring
- Review copies of Board meeting minutes
- Track Board vacancies/composition
- Other

**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.

- Annually
- Semiannually
- Quarterly
- Monthly
- As It Occurs
- Other

**11.3. Tripartite Board Representation Assurance:** Describe how the states 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.

The Indiana CSBG Comprehensive Administrative Review Monitoring Tool requires each community action agency (CAA) to maintain within its bylaws a Petition for Adequate Representation. The purpose is to establish procedures for low-income individuals or organizations who feel they may be disenfranchised by the CAA to be able to petition for more low-income individuals' participation on the tripartite governing board. The Bylaws are reviewed during each CSBG CAR monitoring for Petition for Adequate Representation.

**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? No

**11.4a.** If yes, describe the mechanism used by public eligible entities as an alternative to a Tripartite Board. N/A

## SECTION 12: Individual and Community Income Eligibility Requirements

**12.1. Required Income Eligibility:** Provide the income eligibility threshold for services in the state.

- 125% of the HHS poverty line
- X % of the HHS poverty line (fill in the threshold): 200%
- Varies by eligible entity

At the time of this report's creation, the 200% Federal Poverty Line (FPL), authorized by Congress and in use by Indiana, expires 9/30/2022. At that time, Indiana will return to using 125% FPL unless/until Congress permanently increases the FPL to 200% in the upcoming Congressional session.

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

There is no state policy or procedure for determining income eligibility; agencies are allowed to create and follow their own. CSBG funded programs often utilize income verification processes from other federally funded programs such as Energy Assistance, Head Start and Housing Choice Voucher. CAAs use their own client intake forms to determine income eligibility for local programs.

**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 intake procedures (where individual income verification is not possible or practical). An example of these services is emergency food assistance.

As a part of the annual Community Action Plan, eligible entities must describe their policies for verifying income eligibility for those services with limited in-take procedures. IHCD reviews each Action Plan, and if an explanation is deemed insufficient, requests additional information from the relevant eligible entity.

**12.3. Community-targeted Services:** Describe how the state ensures 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).

As a part of the annual Community Action Plan, eligible entities must describe how they ensure their services target and benefit low-income individuals, even when those services provide a community-wide benefit. IHCD reviews each Action Plan, and if an explanation is deemed insufficient, requests additional information from the relevant eligible entity. IHCD will also review those services, and ask for additional information as necessary, when they are included in the Annual Report Module 3.

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

**13.1. Performance Measurement 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.

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

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

The State of Indiana participates in the ROMA system by monitoring agency activity of the three national goals and NPI's, as outlined in the monitoring manual. Several standards that agencies are monitored on explicitly refer to the ROMA cycle (assessment, planning, implementation, achievement of results, and evaluation), and in several cases agencies are encouraged or required to use a ROMA-certified trainer or implementer in the development in their policies and procedures. All agencies are required to submit an annual CSBG Annual report that includes ROMA data and an annual Community Action Plan that links agency programs to the ROMA cycle.

**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.

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

IHCDA uses the National Performance Indicators, as provided in the CSBG Annual Report Modules 3 & 4. IHCDA specifically uses the NPIs from Module 4 in the Community Action Plan, by having eligible entities set NPI (as well as service) targets in the Action Plan, which are then reported on in the Annual Report.

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

IHCDA supports ROMA Training with CSBG Discretionary funds on an annual or biennial basis, as requested by the state network. Currently, there are 5 ROMA-certified trainers and 1 ROMA-certified implementer.

**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.

As a part of the annual Community Action Plan, eligible entities must identify the community needs (as supported by needs assessment data) that their services address. Additionally, agencies must provide specific examples of changes they made in the past year to improve service delivery and enhance impact for individuals, families, and communities with low incomes. IHCDA reviews each Action Plan, and if an

explanation is deemed insufficient, requests additional information from the relevant eligible entity.

### **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.

Indiana runs on a January-December program year for CSBG. Each September, IHCD posts a template Community Action Plan for the upcoming program year, which is then due in November. The Plan generally asks about each agency's programs, their plans to meet certain assurances, and their training needs. A number of attachments are also included as a part of the plan, such as an annual tracking form for each agency's board membership/attendance. After review of each initial submission, IHCD works with agencies to make any necessary updates prior to the start of the program year on January 1.

**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.

As a part of the annual Community Action Plan, agencies must identify which needs from their most recent Community Needs Assessment are being addressed by specific services. Starting with the 2021 Community Action Plan, each agency has been providing the full version of their most recent Community Needs Assessment (the poverty-by-race category was newly incorporated into this Community Needs Assessment) for IHCD to review, to ensure agencies are fully utilizing their needs assessments to identify and fill gaps in services.

**SECTION 14: CSBG Programmatic Assurance 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;

IHCDA reviews the Community Action Plan that each eligible entity submits to ensure that the services the agency plans to provide in the coming year match the services outlined in the CSBG Act; when Annual Reporting happens, we look at their Action Plan to see how/if it has changed. IHCDA also utilizes

a reimbursement process for claims, to further ensure that CSBG funds are used for activities outlined in the Act.

### ***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;

IHCDA reviews each agency’s Community Action Plan to ensure that the services the agency plans to provide in the coming year match the services outlined in the CSBG Act; the plan includes a question specifically about the agency’s services that focus on youth development. IHCDA reviews each Action Plan, and if an explanation is deemed insufficient, requests additional information from the relevant eligible entity. IHCDA also utilizes a reimbursement process for claims to further ensure that CSBG funds are used for activities outlined in the Act.

### ***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)

As a part of the annual Community Action Plan, eligible entities must identify the programs that CSBG funding supports as well as the programs that agencies manage in general (with or without CSBG support) to which CSBG clients may be referred. Agencies must also list community partnerships and how they coordinate with those partners so CSBG clients can make use of those programs, and so that duplication of services can be avoided. IHCDA reviews each Action Plan, and if an explanation is deemed insufficient, requests additional information from the relevant eligible entity.

### ***State Use of Discretionary Funds***

**14.2. 676(b)(2)** Describe “how the State intends to use discretionary funds made available from the remainder of the grant or allotment described in section 675C(b) in accordance with this subtitle, including a description of

how the State will support innovative community and neighborhood-based initiatives related to the purposes of this subtitle.”

[No response as the state describes this assurance under 7.9 and 7.10.]

***Eligible Entity Service Delivery, Coordination, and Innovation***

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

***Eligible Entity Service Delivery System***

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

Indiana has 22 CSBG Eligible Entities that provide direct services and service referrals to low-income individuals and families. All 92 counties in the state are served by an eligible entity; funding awards are determined based (in part) on the number of counties an entity serves and on the percentage of the states’ low-income population that are within those counties based on decennial census data.

***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 as the state describes this assurance under 9.3b.]

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

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

[No response as the state describes this assurance under 9.7]

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

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

Some eligible entities make CSBG funds available to local partners that are implementing innovative initiatives. But most agencies focus their funds on their own innovative initiatives, which address needs identified in their most recent Community Needs Assessments. Some such initiatives have included developing affordable housing that involves solar energy (to reduce resident energy bills) and

comprehensive wrap-around services; housing for young/new mothers who agree to pursue higher education; a community loan center to offer an alternative to predatory lending; and a food truck whose profits go towards a senior meal service.

### ***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.”

As a part of the annual Community Action Plan, eligible entities must identify whether or not they offer or refer to services that provide, on an emergency basis, supplies, nutritious foods and related services that counteract the conditions of starvation and malnutrition among low-income individuals.

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

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

[No response as the state describes this assurance under Section 9.1 – 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 as the state describes this assurance under 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.”

[No response as the state describes this assurance under 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).”

[No response as the state describes this assurance under 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 as the state describes this assurance under 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 as the state describes this assurance under 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 as the state describes this assurance under 13.5 and 13.6]

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

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

promoting self-sufficiency, family stability, and community revitalization.”

[No response as the state describes this assurance under 13.1 – 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]

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

DRAFT

## 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) [Narrative, 2500 characters]

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.

[55 FR 21690, 21702, May 25, 1990]

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***

##### ***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.

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***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.

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***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.