

CSBG State Plan

Program Name: Community Services Block Grant

Grantee Name: INDIANA HOUSING AND COMMUNITY DEVELOPMENT AUTHORITY

Report Name: CSBG State Plan

Report Period: 10/01/2024 to 09/30/2025


Report Status: Submission Accepted by CO

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CSBG Cover Page (SF-424M)

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES Administration for Children and Families Community Services Block Grant (CSBG)				Form Approved OMB No: 0970-0382 Expires: 09/30/2025	
COVER PAGE					
* 1.a. Type of Submission: <input type="radio"/> Application <input checked="" type="radio"/> Plan <input type="radio"/> Other (2 Year)		* 1.b. Frequency: <input type="radio"/> Annual <input checked="" type="radio"/> Other (2 Year)		* 1.c. Consolidated Application/ Plan/Funding Request? Explanation:	
		* 1.d. Version: <input checked="" type="radio"/> Initial <input type="radio"/> Resubmission <input type="radio"/> Revision <input type="radio"/> Update		2. Date Received:	
		3. Applicant Identifier:		State Use Only:	
		4a. Federal Entity Identifier:		5. Date Received By State:	
		4b. Federal Award Identifier:		6. State Application Identifier:	
7. APPLICANT INFORMATION					
* a. Legal Name: Indiana Housing and Community Development Authority					
* b. Employer/Taxpayer Identification Number (EIN/TIN): 35-1485172				* c. Organizational DUNS: 086870479	
* d. Address:					
* Street 1:	30 South Meridian Street, Suite 900		Street 2:		
* City:	Indianapolis		County:	MARION	
* State:	IN		Province:		
* Country:	United States		* Zip / Postal Code:	46204 -	
e. Organizational Unit:					
Department Name:			Division Name: Community Programs		
f. Name and contact information of person to be contacted on matters involving this application:					
Prefix:	* First Name: Emily		Middle Name:		* Last Name: Krauser
Suffix:	Title: Chief Deputy Director of Programs		Organizational Affiliation: Indiana Housing and Community Development Authority		
* Telephone Number: (317) 242-7777	Fax Number: (317) 232-7778		* Email: ekrauser@ihcda.in.gov		
* 8a. TYPE OF APPLICANT: A: State Government					
b. Additional Description:					
* 9. Name of Federal Agency:					
		Catalog of Federal Domestic Assistance Number:		CFDA Title:	
10. CFDA Numbers and Titles		93569		Community Services Block Grant	
11. Descriptive Title of Applicant's Project					
12. Areas Affected by Funding:					
13. CONGRESSIONAL DISTRICTS OF:					
* a. Applicant 07			b. Program/Project:		
Attach an additional list of Program/Project Congressional Districts if needed.					
14. FUNDING PERIOD:			15. ESTIMATED FUNDING:		
a. Start Date:	b. End Date:	* a. Federal (\$): \$0		b. Match (\$): \$0	
* 16. IS SUBMISSION SUBJECT TO REVIEW BY STATE UNDER EXECUTIVE ORDER 12372 PROCESS?					
a. This submission was made available to the State under the Executive Order 12372					
Process for Review on :					
b. Program is subject to E.O. 12372 but has not been selected by State for review.					

c. Program is not covered by E.O. 12372.	
* 17. Is The Applicant Delinquent On Any Federal Debt? <input type="radio"/> YES <input checked="" type="radio"/> NO	
Explanation:	
18. By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001) **I Agree <input checked="" type="checkbox"/>	
** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.	
18a. Typed or Printed Name and Title of Authorized Certifying Official	18c. Telephone (area code, number and extension)
	18d. Email Address
18b. Signature of Authorized Certifying Official 	18e. Date Report Submitted (Month, Day, Year) 10/11/2024
Attach supporting documents as specified in agency instructions.	

Section 1: CSBG Lead Agency, CSBG Authorized Official, CSBG Point of Contact, and Official State Designation Letter

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SECTION 1 CSBG Lead Agency, CSBG Authorized Official, CSBG Point of Contact, and Official State Designation Letter			
1.1. Identify whether this is a One-Year or a Two-Year Plan		<input type="radio"/> one-year <input checked="" type="radio"/> two-year	
1.1a. Provide the federal fiscal years this plan covers:		Year One 2025	Year Two 2026
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.			
<i>Information should reflect the responses provided in the Application for Federal Assistance, SF-424M.</i>			
Has information regarding the state lead agency and authorized official changed since the last submission of the State Plan? <input type="radio"/> Yes <input checked="" type="radio"/> No			
If yes, select the fields that have been changed [Check all that apply]			
<input type="checkbox"/> Lead Agency	<input type="checkbox"/> Department Type	<input type="checkbox"/> Department Name	
<input type="checkbox"/> Authorized Official	<input type="checkbox"/> Street Address	<input type="checkbox"/> City	
<input type="checkbox"/> Zip Code	<input type="checkbox"/> Office Number	<input type="checkbox"/> Fax Number	
<input type="checkbox"/> Email Address	<input type="checkbox"/> Website		
1.2a. Lead agency		Indiana Housing and Community Development Authority	
1.2b. Cabinet or administrative department of this lead agency <i>[Check one and provide a narrative where applicable]</i>			
<input type="radio"/> Community Affairs Department			
<input checked="" type="radio"/> Community Services Department			
<input type="radio"/> Governors Office			
<input type="radio"/> Health Department			
<input type="radio"/> Housing Department			
<input type="radio"/> Human Services Department			
<input type="radio"/> Social Services Department			
<input type="radio"/> 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			
Name: Emily Krauser		Title: Chief Deputy Director of Programs	
1.2e. Street Address		30 South Meridian Street, Suite 900	
1.2f. City		Indianapolis	1.2g. State IN
1.2i. Telephone number 317 232 - 7777 ext.		1.2j. Fax number 317 232 - 7778	
1.2k. Email address ekrauser@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 the designated agency has changed.			
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 to the state point of contact has changed since the last submission of the State Plan? <input type="radio"/> Yes <input checked="" type="radio"/> No			

If yes, select the fields that have changed [check all the apply]			
<input type="checkbox"/>	Agency Name	<input type="checkbox"/>	Point of Contact
<input type="checkbox"/>	City	<input type="checkbox"/>	Zip Code
<input type="checkbox"/>	Fax Number	<input type="checkbox"/>	Email Address
<input type="checkbox"/>	Street Address	<input type="checkbox"/>	Office Number
<input type="checkbox"/>	Website	<input type="checkbox"/>	

1.4a. Agency Name Indiana Housing and Community Development Authority

1.4b Point of Contact Name

Name: Tina Darling Title: CSBG Manager

1.4c. Street Address 30 South Meridian Street, Suite 900

1.4d. City Indianapolis 1.4e. StateIN 1.4f. Zip 46204

1.4g. Telephone Number 317 232 - 7777 ext. 1.4h. Fax Number 317 232 - 7778

1.4i. Email Address tdarling@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 ☐ No

Has Information regarding the state Community Action Association has changed since the last submission of the State Plan? ☐ Yes ☒ No

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

<input type="checkbox"/>	Agency Name	<input type="checkbox"/>	Executive Director	<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	<input type="checkbox"/>	RPIC Lead		

1.5a. Agency Name Indiana Community Action Association

1.5b. Executive Director or Point of Contact

Name: Ed Gerardot Title: Director

1.5c. Street Address 1845 W. 18th Street

1.5d. City Indianapolis 1.5e. StateIN 1.5f. Zip 46202

1.5g. Telephone number 317 638 - 4232 ext. 1.5h. Fax number 317 634 - 7947

1.5i. Email Address egerardo@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 ☐ Yes ☒ No

Section 2: State Legislation and Regulation

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SECTION 2 State Legislation and Regulation

2.1. CSBG State Legislation:

State has a statute authorizing CSBG ☒ Yes ☐ No

2.2. CSBG State Regulation:

State has regulations for CSBG ☐ Yes ☒ No

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

<https://iga.in.gov/laws/2021/ic/titles/12#12-14-23> Community Action Agencies Indiana Code 2021

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 enacts authorizing legislation or amendments to an existing authorizing statute, last federal fiscal year ☐ Yes ☒ No

2.4b. Regulation Amendments: State established or amended regulations for CSBG last federal fiscal year ☐ Yes ☒ No

Section 3: State Plan Development and Statewide Goals

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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. IHCDA 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.

(Note: This information is associated with State Accountability Measure 1Sa(i) and pre-populates the State's Annual Report, Module 1, Item B.1.)

Based on survey results, our network has first prioritized increasing awareness of community action across the state by having an increased presence at other organizational events, increased marketing materials and press releases, and official recognition of Community Action Month by the Indiana Governors office. They next identified easing the administrative burden of CSBG by increased communication between IHCDA and our state associations CSBG Committee, continued use of training sessions, including leadership cohorts, continuation of our monthly office hours, non-compliance site visits, and continuation of quarterly monitoring Q&A sessions for all agency staff, initiated in early 2024. These efforts allow IHCDA to continue to help eligible entities with capacity-building with emphasis on the state-agency monitoring partnership. (Our monitoring toolkit went through two revisions in 2022-2023, with the final version being released in June 2023. Network feedback was solicited along the way, and a sub-group of agency leadership worked alongside us during this transition.) With discretionary funds, a successful strategy that will continue is direct T&TA post-monitoring. A second use of discretionary funds is to provide opportunities for our network to work with consultants on targeted efforts, such as leadership cohorts, program design and evaluation, community engagement to educate the public about poverty, and for staff training. Finally, IHCDA will work to improve the networks compliance with tripartite board operations. This actually began in 2024 with a 3-part series aimed at governing boards directly, helping them understand their full duties as governing board members. As we see this need emerge through monitoring, those agencies will be encouraged to use their T/TA awards to address it.

3.3. State Plan Development:

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

3.3a. Analysis of state-level tools [Check all that apply and provide additional information where applicable]

☒ 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)

1. Responses to state plan survey sent to Executive Directors. 2. Thirteen in-person agency site visits conducted since January 2022 3. Tri-weekly office hours held with Executive Directors. 4. Evaluation results collected from training sessions. 5. Feedback received during on-site monitoring visits. 6. Ad hoc conversations with agency staff as encountered.

3.3b. Analysis of local-level tools [Check all that applies and provide additional information where applicable]

☐ 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 [Check all that applies and provide additional information where applicable]

☒ 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)

<input checked="checked" type="checkbox"/> Federal CSBG Office	
<input type="checkbox"/> 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.	
<i>(Note: This information is associated with State Accountability Measures 1Sa(ii) and may pre-populate the State's annual report form)</i>	
<p>By a survey sent on June 26, 2024, with a response deadline of July 15, 2024, IHCDAs asked Eligible Entities to review and provide feedback on four specific goals and other drafted responses to selected State Plan questions. (Survey link: https://www.surveymonkey.com/r/25-26StatePlanSurvey.) Based on feedback received from eight of the 22 agencies, the plan was revised and posted to the IHCDAs website on July 19, 2024. Executive Directors and CSBG Managers were notified of this, and that the virtual combined public/legislative hearing, with access information, had been scheduled for August 19, 2024. They, along with Indianas state legislators and the public, were invited to join that hearing and submit any additional comments on the plan via mail or email by August 21, 2024.</p>	
3.4b. Performance Management Adjustment: Describe how the state 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?	
<p>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.</p>	
<i>(Note: This information is associated with State Accountability Measures 1Sb(i) and (ii) and pre-populate the Annual Report, Module 1, Item B.1.)</i>	
<p>As we have done with previous state plans, 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 August 19, 2024.</p>	
3.5. Eligible Entity Overall Satisfaction:	
Provide the State's target for eligible entity Overall Satisfaction during the performance period:	
Year One	77
Year Two	77
Instructional Note: The state's target score will indicate improvement or maintenance of the state's Overall Satisfaction score from the most recent American Customer Survey Index (ACSI) survey of the state's eligible entities. <i>(Note: Item 3.5 is associated with State Accountability Measure 8S and may pre-populate the State's annual report form)</i>	

Section 4: CSBG Hearing Requirements

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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.

A public notice was posted to our IHCD's CSBG website (www.in.gov/ihcda/program-partners/community-services-block-grant-csbg/#Other_Resources), and an email was sent to all 22 CSBG subgrantees on Monday and Tuesday, July 17 and 18, 2024, respectively. In addition, Indiana's 150 state legislators were emailed the same information on Tuesday, July 19, 2024. Review Memo clarification: Via email, IHCD's Governmental Affairs director notified the four caucus leaders of the state plan public hearing (see emails attached to 4.4). No response was received from these emails; the Indiana state legislature is not in session until January of each year. The process followed is the one outlined by IHCD's leadership whereby only IHCD's Governmental Affairs director may contact legislators directly. IHCD staff are not permitted to make such contact without his prior knowledge, involvement and approval. IHCD maintains a record of all written communications with legislators that can be retrieved at any time.

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 Section 676(a)(2)(B) of the CSBG Act.

The notice mentioned above included a link to a draft of the 2025/2026 State Plan on IHCD's website, and an invitation to send comments to IHCD via email, fax, or postal service by 5:00pm ET on Wednesday, August 21, 2024. This provided five weeks for public comment to be returned.

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.

	Date	Location	Type of Hearing [Select an option]	If a combined hearing was held, confirm that the public was invited
1	08/19/2024	Virtual Teams Meeting	Combined	<input checked="" type="checkbox"/>

NOTE : States can add rows as needed for each hearing as needed

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

See attachments: 1) Indiana PN Hearing Notice (includes the Teams meeting hyperlink), 2) Email to Indiana eligible entities, 3) 2025/2026 CSBG Public Hearing transcript (includes attendance list), and 4) Emails sent to the leaders of Indiana's four caucus leaders (Garten, Hamilton, Steuerwald and Taylor).

Section 5: CSBG Eligible Entities

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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.

Note: Table 5.1 pre-populates the Annual Report, Module 1, Table C.1.

Types of Entities include Community Action Agency, Limited Purpose Agency, Local Government Agency, Migrant or Seasonal Farmworker Organization, Tribe or Tribal Organization, and Other

#	CSBG Eligible Entity	Geographical Area Served by county (Provide all counties)	Public or Nonprofit	Type of Entity [choose all that apply]
1	Area IV Agency on Aging and Community Programs, Inc.	Carrol, Clinton, Tippacanoe, White	Non-Profit	Community Action Agency
2	Area Five Agency on Aging and Community Services, Inc.	Cass, Howard, Miami, Tipton, Wabash	Non-Profit	Community Action Agency
3	Community Action of Greater Indianapolis, Inc.	Boone, Hamilton, Hendericks, Marion	Non-Profit	Community Action Agency
4	Community Action of Northeast Indiana, Inc.	Allen, DeKalb, LaGrange, Noble, Steuben, Whitley	Non-Profit	Community Action Agency
5	Community Action Program of Evansville and Vanderburgh County, Inc.	Gibson, Posey, Vanderburgh	Non-Profit	Community Action Agency
6	Community Action of Southern Indiana, Inc.	Clark, Floyd, Harrison	Non-Profit	Community Action Agency
7	Community and Family Services, Inc.	Adams, Blackford, Huntington, Jay, Randolph, Wells	Non-Profit	Community Action Agency
8	Community Action Program, Inc. of Western Indiana	Benton, Fountain, Montgomery, Parke, Vermillion, Warren	Non-Profit	Community Action Agency
9	Human Services, Inc.	Bartholomew, Decatur, Jackson, Johnson, Shelby	Non-Profit	Community Action Agency
10	Hoosier Uplands Economic Development Corp.	Lawrence, Martin, Orange, Washington	Non-Profit	Community Action Agency
11	Interlocal Community Action Program, Inc.	Delaware, Fayette, Hancock, Henry, Rush, Wayne	Non-Profit	Community Action Agency
12	Job Source - Central Indiana Community Action Program	Grant, Madison	Public	Community Action Agency
13	Lincoln Hills Development Corporation	Crawford, Perry, Spencer	Non-Profit	Community Action Agency
14	North Central Community Action Agencies, Inc.	LaPorte, Pulaski, Starke	Non-Profit	Community Action Agency
15	Northwest Indiana Community Action Corp.	Jasper, Lake, Newton, Porter	Non-Profit	Community Action Agency
16	Ohio Valley Opportunities Inc.	Jefferson, Jennings, Scott	Non-Profit	Community Action Agency
17	PACE Community Action Agency, Inc.	Daviess, Greene, Knox, Sullivan	Non-Profit	Community Action Agency
18	REAL Services, Inc.	Elkart, Fulton, Kosciusko, Marshall, St. Joseph	Non-Profit	Community Action Agency
19	South Central Community Action Program, Inc.	Brown, Monroe, Morgan, Owen	Non-Profit	Community Action Agency
20	Southeastern Indiana Economic Opportunity Corp.	Dearborn, Franklin, Ohio, Ripley, Switzerland, Union	Non-Profit	Community Action Agency
21	Dubois-Pike-Warrick Economic Opportunity	Dubois, Pike, Warrick	Non-Profit	Community Action Agency
22	Western Indiana Community Action Agency, Inc.	Clay, Putnam, Vigo	Non-Profit	Community Action Agency

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: [Check all that apply].

- ☐ 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	Delete

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

CSBG Eligible Entity	Reason	Delete

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.	Delete

Section 6: Organizational Standards for Eligible Entities

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SECTION 6 Organizational Standards for Eligible Entities

Note: Reference IM 138, *State Establishment of Organizational Standards for CSBG Eligible Entities*, for more information on Organizational Standards. Click [HERE](#) for IM 138.

6.1. Choice of Standards: 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

☐ 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 26 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 2023 IHCD CSBG Monitoring Toolkit for the full list and explanations of the federal and state/pass-through standards that IHCD monitors. We have adopted and use IM-138 standards as the foundation for our monitoring. IM-138 also allows us to use state-adopted standards which, in Indiana, incorporate other Federal rules/requirements, aspects of Indiana Code (which has specific requirements for community action), policies from our agency (e.g., claims submissions, grant agreement compliance), and other things (e.g., financial components) based on our own monitoring experiences. In Indiana, we monitor all of these things at the same time, once every three years. As such, our monitoring is more inclusive and takes a deeper dive into each agency's operations

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

6.1c. Alternative Organizational Standards Changes: 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

☒ There were no changes from the previous State Plan submission

Provide reason for using alternative standards

Describe rigor compared to COE-developed Standards

6.2. Implementation: Check the box that best describes how the state officially adopt(ed) organizational standards for eligible entities in the state in a manner consistent with the state's administrative procedures act. If "Other" is selected, provide a timeline and additional information, as necessary. *[Check all that apply and narrative where applicable]*

☐ Regulation

☒ Policy

☐ Contracts with eligible entities

☐ Other, describe:

6.3. Organizational Standards Assessment: Describe how the state assess eligible entities against organizational standards this federal fiscal year(s). *[Check all that apply.]*

☐ Peer-to-peer review (*with validation by the State or state-authorized third party*)

☒ Self-assessment (*with validation by the State or state-authorized third party*)

☒ Self-assessment/peer review with state risk analysis

☐ State-authorized third party validation

☒ Regular, on-site CSBG monitoring

☐ Other

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

Indiana conducts a CSBG Monitoring Review for each agency at a minimum of every three years. (Note: because of the monitoring tool revisions mentioned in Question 3.2 above, IHCD was able to monitor only one agency in 2023. Between 2024-2026, we will double our monitoring schedule to catch up to the point where we can return to our normal schedule of monitoring once every three years. Our OCS program officer, Kathryn Maddux, was notified of this situation during a 1:1 update call in 2023. Indiana utilizes a 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 a Monitoring Notification, sent 45-60 days in advance. Next, agencies are asked to upload documents to a secure cloud-based folder allowing IHCD monitoring staff to complete

much of the monitoring review in advance of the onsite visit. Next, an Entrance Conference for agency leadership staff is held which generally outlines the logistics and main points of the monitoring event. Onsite, interviews are conducted with governing board members and agency leadership staff such as the Executive Director, Finance Manager, Human Resource Manager and CSBG Manager. Prior to leaving, an exit conference is held with the 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 Monitoring Report is distributed within 30 calendar days of the exit conference. It contains the monitoring results and identifies which organizational standards were met/not 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 take 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 standards self-assessment. Furthermore, an annual risk assessment is conducted that may result in interim monitoring if a high risk is determined. Other major program reviews are 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)? ☐ Yes ☒ No

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

Total Number of Exempt Entities: 0

CSBG Eligible Entity	Description / Justification	Delete

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

Year One	92%	Year Two	92%
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Note: Item 6.5 is associated with State Accountability Measures 6Sa and prepopulate the Annual report, Module I, Table D.2.

Section 7: State Use of Funds

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
Administration for Children and Families
Community Services Block Grant (CSBG)

Form Approved
OMB No: 0970-0382
Expires:09/30/2025

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.

Indiana will continue to use its updated formula that reflects 1) 2020 census data (the base information for our formula) and 2) as requested by our network, a \$200,000 floor to ensure no eligible entity receives too low an allocation. Indianas 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 agencys region. The allocation table approved by the IHCD Board of Directors in August 2022 will be used until the next Federal census is completed.

7.1b. Statute: Does a state statutory or regulatory authority specify the formula for allocating "not less than 90 percent" funds among eligible entities? ☐ Yes ☒ No

7.2. Planned Allocation:

Specify the percentage of your CSBG planned allocation that will be funded to eligible entities and "not less than of 90 percent funds" 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.

Note: This information pre-populates the state's Annual Report, Module 1, Table E.2.

Year One	90.00%	Year Two	90.00%
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Planned CSBG 90 Percent Funds

CSBG Eligible Entity	Year One Funding Amount \$	Delete
Area IV Agency on Aging and Community Programs, Inc.	\$452,816	
Area Five Agency on Aging and Community Services, Inc.	\$381,538	
Community Action of Greater Indianapolis, Inc.	\$1,565,542	
Community Action of Northeast Indiana, Inc.	\$722,246	
Community Action Program of Evansville and Vanderburgh County, Inc.	\$389,030	
Community Action of Southern Indiana, Inc.	\$314,600	
Community and Family Services, Inc.	\$366,458	
Community Action Program, Inc. of Western Indiana	\$305,407	
Human Services, Inc.	\$452,280	
Hoosier Uplands Economic Development Corp.	\$254,066	
Interlocal Community Action Program, Inc.	\$590,310	
Job Source - Central Indiana Community Action Program	\$338,819	
Lincoln Hills Development Corporation	\$204,801	
North Central Community Action Agencies, Inc.	\$287,136	
Northwest Indiana Community Action Corp.	\$860,662	
Ohio Valley Opportunities Inc.	\$214,678	
PACE Community Action Agency, Inc.	\$282,026	
REAL Services, Inc.	\$783,270	
South Central Community Action Program, Inc.	\$432,551	
Southeastern Indiana Economic Opportunity Corp.	\$305,705	
Dubois-Pike-Warrick Economic Opportunity	\$225,977	

Western Indiana Community Action Agency, Inc.	\$320,746	
Total		\$10,050,664

CSBG Eligible Entity Year Two		
CSBG Eligible Entity	Year Two Funding Amount \$	Delete
Area IV Agency on Aging and Community Programs, Inc.	\$452,816	
Area Five Agency on Aging and Community Services, Inc.	\$381,538	
Community Action of Greater Indianapolis, Inc.	\$1,565,542	
Community Action of Northeast Indiana, Inc.	\$722,246	
Community Action Program of Evansville and Vanderburgh County, Inc.	\$389,030	
Community Action of Southern Indiana, Inc.	\$314,600	
Community and Family Services, Inc.	\$366,458	
Community Action Program, Inc. of Western Indiana	\$305,407	
Human Services, Inc.	\$452,280	
Hoosier Uplands Economic Development Corp.	\$254,066	
Interlocal Community Action Program, Inc.	\$590,310	
Job Source - Central Indiana Community Action Program	\$338,819	
Lincoln Hills Development Corporation	\$204,801	
North Central Community Action Agencies, Inc.	\$287,136	
Northwest Indiana Community Action Corp.	\$860,662	
Ohio Valley Opportunities Inc.	\$214,678	
PACE Community Action Agency, Inc.	\$282,026	
REAL Services, Inc.	\$783,270	
South Central Community Action Program, Inc.	\$432,551	
Southeastern Indiana Economic Opportunity Corp.	\$305,705	
Dubois-Pike-Warrick Economic Opportunity	\$225,977	
Western Indiana Community Action Agency, Inc.	\$320,746	
Total		\$10,050,664

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

During 2025/2026 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 Fiscal Monitor/Analyst 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. Step 5: The CSBG Fiscal Monitor/Analyst sends the awards via GigaSign for e-signatures. Step 6: The CSBG Fiscal Monitor/Analyst sends and collects corresponding budget forms for each award allocation/amendment.

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 plan to make funds available to eligible entities no later than 30 calendar days after OCS distributes the federal award? ☐ Yes ☒ No

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

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

While IHCA usually receives 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, 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 a full 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. Put another way, our agencies have 21 months to spend all funds allocated for each fiscal year. 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.			
Note: This information is associated with State Accountability Measure 2Sb and may prepopulate the state's annual report form.			
IHCD holds regular claims trainings for the network. We will also arrange trainings for individual agencies if requested. The IHCD staff member who reviews CSBG claims sends a monthly report to the CSBG Manager reflecting errors or mistakes noted in CSBG claims received to date. As needed, the CSBG Manager will address those directly with the agency in question. The CSBG Manager and CSBG Fiscal Monitor work closely with the IHCD claims staff to verify allowable costs and/or other discrepancies that arise during the claiming process.			
Administrative Funds [Section 675C(b)(2) of the CSBG Act]			
Note: This information pre-populates the state's Annual Report, Module 1, Table E.4.			
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 (0.00%)	5.00	Year Two (0.00%)	5.00
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	44.00	Year Two	44.00
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	5.00	Year Two	5.00
7.9. Remainder/Discretionary Funds Use: Does the state have remainder/discretionary funds, as described in Section 675C(b)(1) of the CSBG Act? <input checked="" type="radio"/> Yes <input type="radio"/> No			
If yes, provide the allocated percentage and describe the use of the remainder/discretionary funds in the table below.			
Year One (0.00%)	5.00%	Year Two (0.00%)	5.00%
Use of Remainder/Discretionary Funds (See Section 675C(b)(1) of the CSBG Act)			
Note: This response will link to the corresponding assurance, Item 14.2.			
If a funded activity fits under more than one category in the table, allocate the funds among the categories. For example, if the state provides funds under a contract with the State Community Action association to provide training and technical assistance to eligible entities and to create a statewide data system, the funds for that contract should be allocated appropriately between Items 7.9a. - 7.9c. If allocation is not possible, the state may allocate the funds to the main category with which the activity is associated.			
Note: This information is associated with State Accountability Measures 3Sa and pre-populates the annual report Module 1, Table E.7.			
Remainder/Discretionary Fund Uses		Year One Planned \$	Brief description of services/activities and/or activities
7.9a. Training/technical assistance to eligible entities		\$285,000.00	These planned services/activities will be described in State Plan Item 8.1.
7.9b. Coordination of state-operated programs and/or local programs		\$0.00	These planned services/activities will be described in State Plan Section 9, state Linkages and Communication.
7.9c. Statewide coordination and communication among eligible entities		\$0.00	These planned services/activities will be described in State Plan Section 9, state Linkages and Communication.
7.9d. Analysis of distribution of CSBG funds to determine if targeting greatest need		\$0.00	
7.9e. Asset-building programs		\$0.00	
7.9f. Innovative programs/activities by eligible entities or other neighborhood groups		\$150,000.00	Agency Impact Grants or similar opportunities identified to build community awareness around an issue, poverty alleviation or education/awareness.
7.9g. State charity tax credits		\$0.00	
7.9h. Other activities, specify in column 3		\$20,000.00	Homeless Point-in-Time (PIT) Count
Total		\$455,000.00	
Remainder/Discretionary Fund Uses		Year Two Planned \$	Brief description of services/activities
7.9a. Training/technical assistance to eligible entities		\$285,000.00	These planned services/activities will be described in State Plan Item 8.1.
7.9b. Coordination of state-operated programs and/or local programs		\$0.00	These planned services/activities will be described in State Plan Section 9, state Linkages and Communication.
7.9c. Statewide coordination and communication among eligible entities		\$0.00	These planned services/activities will be

		described in State Plan Section 9, state Linkages and Communication.
7.9d. Analysis of distribution of CSBG funds to determine if targeting greatest need	\$0.00	
7.9e. Asset-building programs	0	
7.9f. Innovative programs/activities by eligible entities or other neighborhood groups	\$150,000.00	Agency Impact Grants or similar opportunities identified to build community awareness around an issue, poverty alleviation or education/awareness.
7.9g. State charity tax credits	\$0.00	
7.9h. Other activities, specify in column 3	\$20,000.00	Homeless Point-in-Time (PIT) Count
Total	\$455,000.00	

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

☐ 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

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

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

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

IHCDA 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. These awards have proven highly successful for our network. In addition, the cohort model for training has proven very successful, primarily with our new Executive Directors (Indiana has seen eight retirements or resignations since 2021) and continuing with round table trainings offered by our state association for Human Resources staff and Fiscal staff. In 2024-2025, our discretionary awards to the network will support a cohort of no more than three agencies working together with a consultant on program design, program implementation and program data evaluation. In keeping with requests from last year, this will allow the network to learn from each other, peer-to-peer, rather than top-down from the state. Building on a special disability study funded to the Indiana Community Action Poverty Institute with FY2024 funds, we may decide to provide discretionary awards to implement/revamp agency programs that provide services to those with disabilities. Finally, because dollars to send agency staff to higher level impactful trainings are scarce, IHCDA will devote discretionary dollars toward this effort, allowing agency staff to learn from the best across the country.

Section 8: State Training and Technical Assistance

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
Administration for Children and Families
Community Services Block Grant (CSBG)

Form Approved
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SECTION 8

State Training and Technical Assistance

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

***Note:** This information is associated with State Accountability Measure 3Sc and pre-populates the Annual Report, Module 1, Table F.1.*

Training and Technical Assistance - Year One

	Planned Timeframe	Training, Technical Assistance, or Both	Topic	Brief Description of "Other"
1	Ongoing / Multiple Quarters	Training	Other	General training on a variety of topics, including those in the dropdown list.
2	Ongoing / Multiple Quarters	Technical Assistance	Monitoring	
3	Ongoing / Multiple Quarters	Both	Other	Network Uniform Guidance/cost-allowability training

Training and Technical Assistance - Year Two

	Planned Timeframe	Training, Technical Assistance, or Both	Topic	Brief Description of "Other"
1	Ongoing / Multiple Quarters	Training	Other	General training on a variety of topics, including those in the dropdown list.
2	Ongoing / Multiple Quarters	Technical Assistance	Monitoring	
3	Ongoing / Multiple Quarters	Both	Other	Network Uniform Guidance/cost-allowability training

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

Year One	\$285,000	Year Two	\$285,000
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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 from current trainings provided by both our state association and our other training consultants. Our state association elected new board-level leadership in 2023, including new members to their CSBG Committee. That committee's chair and the IHCD CSBG Manager frequently discuss ideas generated from that committee for incorporation into T/TA efforts and elsewhere. Feedback and insight are collected from monitoring results and the onsite exit conferences. We turn to best practices identified from national partners (NASCSP, CAPLAW, Wipfli, etc.). The CSBG Manager also encourages ad hoc conversations with agency leadership as requested. IHCD will work more closely with other state agencies to provide training and technical assistance on relevant state programs and on how to form linkages with other state-funded entities. Review Memo Clarification: Topics for the next year are identified and determined at the current year's end. Based on current year evaluation feedback, trends we see in monitorings, ad hoc conversations with the network, priorities identified by OCS, and other current topics as identified by IHCD, we build the next year's slate of webinars.

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 ☐ No

***Note:** 8.2 is associated with State Accountability Measure 6Sb. The state should put a TAP in place to support eligible entities with one or more unmet organizational standards.*

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 Plans 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

<input checked="" type="checkbox"/> State Community Action association	
<input type="checkbox"/> Regional CSBG technical assistance provider(s)	
<input checked="" type="checkbox"/> National technical assistance provider(s)	
<input checked="" type="checkbox"/> Individual consultant(s)	
<input type="checkbox"/> Tribes and Tribal Organizations	
<input type="checkbox"/> 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.

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

CAAs often request training or additional assistance on CSBG-specific reporting or monitoring. In the past two years, more training on data management and evaluation was requested. As such, our 2023 Impact Grants targeted that topic. In addition, we provided a 4-part Data 101 series that included things like data storytelling basics, data-sharing for boards, and how to create surveys to get the desired answers. As noted previously, IHCD is 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. With the arrival of new executive directors, they will frequently ask for more help understanding the specifics of CSBG, for example, how to best orient and train their boards of directors. As such, we contracted with a national consultant who held a 3-part board governance training which was offered twice for each part, lunch time and evening, to facilitate attendance.

Section 9: State Linkages and Communication

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
Administration for Children and Families
Community Services Block Grant (CSBG)

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SECTION 9 State Linkages and Communication

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

9.1. State Linkages and Coordination at the State Level:

Describe the linkages and coordination at the state level that the state intends to create or maintain to ensure increased access to CSBG services to low-income people and communities under this State Plan and avoid duplication of services (as required by the assurance under Section 676(b)(5)).

Describe additional information as needed.

Note: This response will link to the corresponding CSBG assurance, item 14.5. In addition, this item is associated with State Accountability Measure 7Sa andand pre-populates the Annual Report, Module 1, Item G.1.

- ☒ 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

Other agencies/organizations as their paths cross ours with funding proposals, legislative requests/collaborations, etc.

9.2. State Linkages and Coordination at the Local Level:

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

Note: This response will link to the corresponding CSBG assurances, items 14.5 and 14.6., and pre-populates the Annual Report, Module 1, Item G.2.

IHCDA stands ready to connect eligible entities with related state agencies and other organizations with similar missions as needed and/or as requested. As such, the Chief Deputy Director of Programs regularly attends meetings with other community partners to raise awareness of CAAs in their communities. These include local United Way agencies and community foundations. In addition, we provide discretionary funding to incentivize eligible entities to pursue/maintain local coordination with these groups. The CSBG Manager remains engaged with the Indiana University Center for Rural Engagement, and the Indiana Rural Health Association. Because every one of Indianas 22 community action agencies include rural counties in their service areas, it is imperative that connections from such rural-focused programs be made. In 2025/2026, IHCDA would like to increase awareness about community action in Indiana and how the network can benefit those living in extreme rural areas. Finally, even though the public health emergency has officially ended, Indiana is adjusting to changes in health coverage mandates from both CMS and the courts due to advocacy efforts to decrease barriers to that coverage. The CSBG Manager remains a member of a task force aimed at ensuring those enrolled in Indianas health coverage programs are not dropped and are aware of impending changes to their coverage. Communication on this effort will continue to the network.

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)).

Note: This response will link to the corresponding CSBG assurance, item 14.5.and pre-populates the Annual Report, Module 1, Item G.3a.

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. IHCDA 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, IHCDA 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.

Note: This response will link to the corresponding CSBG assurance, item 14.3b., and pre-populates the Annual Report, Module 1, Item G.3b.

CSBG Eligible Entities rely on their triennial community needs assessment (most recently in 2023) 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)? ☐ Yes

☒ No

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

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

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. Review Memo Clarification: IHCD also has quarterly calls with the Indiana Department of Workforce Development and we have a relationship with the Governor's Workforce Cabinet. However, in Indiana, there is not a strong programmatic tie between Community Action and One Stop Centers at the state level. As noted above, at the local level, CAP agencies work with local One Stops as appropriate for their local communities.

9.5. Emergency Energy Crisis Intervention:

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

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

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 19 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, Community Organizations:

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

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

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.

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

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. As we review claims, we collect information about other programs that are funded in part by CSBG. 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.

Note: This information will pre-populate the Annual Report, Module 1, Item G.5.

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. IHCD also supports training provided at the INCAA annual statewide conference.

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. For any topic that is not applicable, select "Not Applicable" under Expected Frequency.

Communication Plan

Subject Matter	Expected Frequency	Format	Brief description of "Other"
Upcoming Public and/or Legislative Hearings	As needed	Meetings/Presentation	
State Plan Development			

	Biannual	Meetings/Presentation Email Website Public Notice	
Organizational Standards Progress	Annually	Meetings/Presentation Email Other	Monitoring review
State Accountability Measures Progress	Biannual	Meetings/Presentation Email Webinar	
Community Needs Assessments/ Community Action Plans	Annually	Meetings/Presentation Email	
State Monitoring Plans and Policies	Annually	Meetings/Presentation Email Website Other	
Training and Technical Assistance (T/TA) Plans	Biannual	Meetings/Presentation Email Website	
ROMA and Performance Management	As needed	Meetings/Presentation Email Website Other	Monthly office hours, non-monitoring site visits
State Interagency Coordination	As needed	Meetings/Presentation Email Website Public Notice	Monthly office hours, non-monitoring site visits
CSBG Legislative/Programmatic Updates	As needed	Meetings/Presentation Email Website Public Notice	Monthly office hours, non-monitoring site visits
Tripartite Board Requirements	As needed	Meetings/Presentation Email Website Public Notice	Monthly office hours, non-monitoring site visits

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.

Note: This information is associated with State Accountability Measure 5S(iii). and will pre-populate the Annual Report, Module 1, Item G.6

Feedback from the State Accountability Measures will be emailed to the Executive Directors of CAAs within 30 days of receiving the report. In addition, IHCDAs attend all monthly INCAA Board Meetings and will provide additional updates and request additional feedback in that forum. IHCDAs 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. With utility programs leadership, the CSBG Manager meets monthly with the state association to provide feedback/Q&A for projects currently contracted with the state association. Finally, the CSBG Manager continues to make 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.

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

IHCDAs 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 2024, the IHCDAs CSBG website was redesigned to be more responsive and to allow easier access to key CSBG documents housed there. In 2023, the CSBG Manual was updated and posted to the partners website (<https://www.in.gov/ihcda/files/2024-CSBG-Manual-FINAL-April-2024.pdf>). In 2023, the revised Monitoring Tool was released and posted on the website; a corresponding training on significant changes and for miscellaneous Q&A is provided quarterly to the network. In 2025, this time may be used to provide training on what we are seeing in monitoring results that will benefit the entire network, not just individual agencies post-monitoring.

Section 10: Monitoring, Corrective Action, and Fiscal Controls

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
Administration for Children and Families
Community Services Block Grant (CSBG)

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SECTION 10 Monitoring, Corrective Action, and Fiscal Controls

Monitoring, Corrective Action and Fiscal Controls (Section 678B(a) of the 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.

Note: This information is associated with State Accountability Measure 4Sa(i); this response pre-populates the Annual Report, Module 1, Table H.1.

	CSBG Eligible Entity	Monitoring Type	Review Type	Target Quarter	Start Date of Last Full Onsite Review	End Date of Last Full Onsite Review	Brief Description of "Other"
1	Area IV Agency on Aging and Community Programs, Inc.	No review					
2	Area Five Agency on Aging and Community Services, Inc.	No review					
3	Community Action of Greater Indianapolis, Inc.	No review					
4	Community Action of Northeast Indiana, Inc.	Full On-site	Onsite Review	FY1 Q1	08/10/2021	08/18/2021	
5	Community Action Program of Evansville and Vanderburgh County, Inc.	Full On-site	Onsite Review	FY1 Q2	05/18/2022	05/19/2022	Includes New Executive Director
6	Community Action of Southern Indiana, Inc.	Full On-site	Onsite Review	FY1 Q3	08/15/2022	10/27/2022	Includes New Executive Director
7	Community and Family Services, Inc.	Full On-site	Onsite Review	FY1 Q2	06/08/2021	08/19/2021	Includes New Executive Director
8	Community Action Program, Inc. of Western Indiana	No review					
9	Human Services, Inc.	No review					
10	Hoosier Uplands Economic Development Corp.	No review					
11	Interlocal Community Action Program, Inc.	No review					
12	Job Source - Central Indiana Community Action Program	No review					
13	Lincoln Hills Development Corporation	Full On-site	Onsite Review	FY1 Q2	11/03/2022	11/17/2022	Includes New Executive Director
14	North Central Community Action Agencies, Inc.	No review					
15	Northwest Indiana Community Action Corp.	Full On-site	Onsite Review	FY1 Q4	08/02/2022	08/11/2022	
16	Ohio Valley Opportunities Inc.	No review					
17	PACE Community Action Agency, Inc.	Full On-site	Onsite Review	FY1 Q3	04/13/2021	05/28/2021	Includes New Executive Director
18	REAL Services, Inc.	Full On-site	Onsite Review	FY1 Q1	06/29/2021	07/14/2021	Includes New Executive Director
	South Central Community Action	No review					

19	Program, Inc.						
20	Southeastern Indiana Economic Opportunity Corp.	Full On-site	Onsite Review	FY1 Q3	09/07/2021	10/21/2021	
21	Dubois-Pike-Warrick Economic Opportunity	Full On-site	Onsite Review	FY1 Q1	10/12/2021	10/21/2021	
22	Western Indiana Community Action Agency, Inc.	No review					
	CSBG Eligible Entity	Monitoring Type	Review Type	Target Quarter	Start Date of Last Full Onsite Review	End Date of Last Full Onsite Review	Brief Description of "Other"
1	Area IV Agency on Aging and Community Programs, Inc.	Full On-site	Onsite Review	FY2 Q2	04/11/2022	04/21/2022	
2	Area Five Agency on Aging and Community Services, Inc.	No review					
3	Community Action of Greater Indianapolis, Inc.	No review					
4	Community Action of Northeast Indiana, Inc.	No review					
5	Community Action Program of Evansville and Vanderburgh County, Inc.	No review					
6	Community Action of Southern Indiana, Inc.	No review					
7	Community and Family Services, Inc.	No review					
8	Community Action Program, Inc. of Western Indiana	No review					
9	Human Services, Inc.	No review					
10	Hoosier Uplands Economic Development Corp.	Full On-site	Onsite Review	FY2 Q2	07/11/2022	07/21/2022	
11	Interlocal Community Action Program, Inc.	No review					
12	Job Source - Central Indiana Community Action Program	No review					
13	Lincoln Hills Development Corporation	No review					
14	North Central Community Action Agencies, Inc.	Full On-site	Onsite Review	FY2 Q1	06/02/2022	06/15/2022	
15	Northwest Indiana Community Action Corp.	No review					
16	Ohio Valley Opportunities Inc.	Full On-site	Onsite Review	FY2 Q2	10/11/2022	10/20/2022	Includes New Executive Director
17	PACE Community Action Agency, Inc.	No review					
18	REAL Services, Inc.	No review					
19	South Central Community Action Program, Inc.	No review					
20	Southeastern Indiana Economic Opportunity Corp.	No review					
21	Dubois-Pike-Warrick Economic Opportunity	No review					
22	Western Indiana Community Action Agency, Inc.	Full On-site	Onsite Review	FY2 Q1	11/09/2021	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-CSBG-Monitoring-Toolkit-2023-2025June.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?							
<i>Note: This item is associated with State Accountability Measure 4Sa(ii) and may pre-populate the state's annual report form.</i>							
30							
<p align="center">Corrective Action, Termination and Reduction of Funding and Assurance Requirements (Section 678C of the Act)</p>							

10.4. Closing Findings: Are state procedures for addressing eligible entity findings/deficiencies and documenting the closure of findings, included in the State monitoring protocols attached above? <input checked="" type="radio"/> Yes <input type="radio"/> No
10.4a. Closing Findings Procedures: If no describe state procedures for addressing eligible entity findings/deficiencies, and documenting the closure of findings.
10.5. Quality Improvement Plans (QIPs): Provide the number of eligible entities currently on QIPs, if applicable.
<i>Note: The QIP information is associated with State Accountability Measures 4Sc.</i>
3
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
<i>Note: This item is associated with State Accountability Measures 4Sa(iii).</i>
The Office of Community Services (OCS) is notified within 30 days of IHCDAs Division of Community Programs assigning a community action agencies (CAA) quality improvement plan (QIP). OCS receives a copy of the IHCDAs CSBG Monitoring Report, IHCDAs Onsite Monitoring Completion letter which provides the official QIP notification to the CAA, and the IHCDAs CSBG QIP Acceptance letter that begins the CAAs corrective action 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). <input checked="" type="radio"/> Yes <input type="radio"/> No
<i>Note: This response will link with the corresponding assurance under item 14.8.</i>
<p align="center">Policies on Eligible Entity Designation, De-designation, and Re-designation</p>
10.8. Eligible Entity Designation: Do the State CSBG statute and/or regulations provide for the designation of new eligible entities? <input checked="" type="radio"/> Yes <input type="radio"/> No
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
10.9. Eligible Entity Termination: Do State CSBG statute and/or regulations provide for termination of eligible entities <input type="radio"/> Yes <input checked="" type="radio"/> No
10.9a. Termination Citation: If yes, provide the citation(s) of the law and/or regulation.
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. Review Memo Clarification: Indiana has used IM116 as its guide in developing its de-designation process. A full description of the process can be found in IHCDAs CSBG Manual (see Section 9) www.in.gov/ihcda/files/2024-CSBG-Manual-FINAL-April-2024.pdf . We also have files with past examples and templates to assist the team should an agency with a QIP need to be notified of a potential de-designation.
10.10. Does the State CSBG statute and/or regulations specify a process the State CSBG agency must follow to re-designate an existing eligible entity? <input type="radio"/> Yes <input checked="" type="radio"/> No
10.10a. If Yes, provide the citation(s) of the law and/or regulation.
10.10b. If No, describe State procedures for re-designation of existing eligible entities. There is currently no process for re-designation for the Community Action Agencies. CAAs remain in their status unless terminated, voluntarily relinquished, or cease operations. Review Memo Clarification: In Indiana, designation is recommended by the Governor, often to an agency that is identified or recommended by the state. IHCDAs is not authorized to write policy to dictate the Governor's decision in this regard.
<p align="center">Fiscal Controls and Audits and Cooperation Assurance</p>
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 IHCDAs using a funding formula. As a part of the contract process, IHCDAs 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 IHCDAs claims system for tracking. IHCDAs 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; IHCDAs does not provide cash advances. Claims are also limited to the amounts set by the eligible entity's 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. IHCDAs verifies that the cost and accounting standards of the Office of Management and Budget are accurately applied to IHCDAs and the Sub-grantees that receive CSBG funding. IHCDAs 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. IHCDAs prepare an individual balance sheet and income statement monthly for this program as well as consolidated statements for all IHCDAs programs and activities. IHCDAs use 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.

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

IHCDAs have 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, Schedule of Expenditures of Federal Awards (SEFA), compliance Reports, Schedule of Findings and Questioned Costs, Reoccurring Financial Statement issues, findings specifically linked to IHCDAs 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 IHCDAs 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 ☐ No

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

10.13a. Federal Investigations Policies: Are state procedures for permitting and cooperating with federal investigations included in the state monitoring policies attached under 10.2? ☐ Yes ☒ No

10.13b. Closing Findings Procedures: If no, describe state procedures for permitting and cooperating with federal investigations.

While not in our state monitoring policies, it is included in the state's funding award agreement signed by each agency, and reads as follows: "Section 7.I Sub-grantee shall ensure the cooperation of its employees, officers, board members, and subcontractors in any review, audit, or inspection conducted by authorized representatives of IHCDAs or the United States Government." Review Memo Clarification: As noted above, IHCDAs leadership and Legal Counsel provide this stipulation in our award agreements, and as such considers this assurance to be met by both parties upon full execution of the award agreements

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.

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

As mentioned in Question 6.3 above, IHCDAs worked with our network to complete two revisions to our monitoring tool. The result is a more streamlined process, significantly reducing interruptions to the agency's time. This was also a step toward reducing the administrative burden of CSBG that we hear so much about from our network. Where previously each agency was given a numeric score for meeting, partially meeting or not meeting each standard, now each standard is either met or not met. The final score actually represents the percentage of standards met. This process 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 IHCDAs to review how the agency meets state/pass through standards and implements their CSBG contractual obligations. As we do with any such major revision, the Indiana network was given a thirty-day comment period, which was followed by a virtual call where specific clarifying questions could be asked. We also implemented a quarterly open Q&A session where further clarifications can be made. The State of Indiana monitoring process utilizes the CSBG Organizational Standards (IM-138), state and federal codes, IHCDAs 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 utilize an annual risk assessment where outcomes result in determining any additional requirements for monitoring. The monitoring results form the basis for any Technical Assistance Plans and Quality Improvement Plans for 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. NOTE: Per Question 10.13a, while we do not include this provision in our monitoring policies, it is included in our sub-grantee agreement that all eligible entities sign when receiving CSBG funds.

Section 11: Eligible Entity Tripartite Board

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
Administration for Children and Families
Community Services Block Grant (CSBG)

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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 *[Check all that applies and narrative where applicable]*

- ☐ 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 require eligible entities (which are not on TAPs or QIPs) to provide updates regarding their Tripartite Boards. This includes but is not limited to copies of meeting minutes, vacancy alerts, changes to bylaws, low-income member selection process, etc., *[Select one and narrative where applicable]*

- ☒ Annually
- ☐ Semiannually
- ☐ Quarterly
- ☐ Monthly
- ☐ As it Occurs
- ☐ Other

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

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

The Indiana CSBG Monitoring Tool requires each agency 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 agency to be able to petition for more low-income individuals participation on the tripartite governing board. The Bylaws are reviewed during each CSBG monitoring for Petition for Adequate Representation. In addition, during monitoring, each low-income representatives democratic selection process is reviewed and the process for their selection is verified against the agency's policy for such selection.

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 participating by low income individuals in the development, planning, implementation, and evaluation of programs" as allowed under Section 676B(b)(2) of the CSBG Act. ☐ Yes ☒ No

11.4a. Tripartite Board Alternative Mechanism: If yes, describe the mechanism used by public eligible entities as an alternative to a Tripartite Board.

Section 12: Individual and Community Eligibility Requirements

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
Administration for Children and Families
Community Services Block Grant (CSBG)

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SECTION 12 Individual and Community Income Eligibility Requirements

12.1. Required Income Eligibility:

Provide the income eligibility threshold for services in the state.

[Check one item below.]

☐ 125% of the HHS poverty line ☒ X% of the HHS poverty line (fill in the threshold) ☐ Varies by eligible entity

200% % *[Response Option: numeric field]*

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

At the time of this reports creation, the 200% Federal Poverty Line (FPL), authorized by Congress and in use by Indiana, expires 9/30/2024. At that time, Indiana will return to using 125% FPL unless/until Congress permanently increases the FPL to 200% in a future Congressional session. There is no state policy or procedure for determining income eligibility; agencies are allowed to create and follow their own processes. 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 in-take 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 and provide 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 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

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
Administration for Children and Families
Community Services Block Grant (CSBG)

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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.

Note: This response will also link to the corresponding assurance, Item 14.12. and will pre-populate the Annual Report, Module 1, Item I.1.

- ☒ The Results Oriented Management and Accountability (ROMA) System
- ☐ Another performance management system that meets the requirements by 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 of 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.

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.

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

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

IHCDA uses the NPI's as provided in the CSBG Annual Report Modules 3 and 4. IHCDA specifically incorporates the NPI's 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 the ROMA or alternative performance measurement system.

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

IHCDA supports ROMA Training with CSBG Discretionary funds on an annual or biennial basis, as requested by the state network. Currently, there are 3 ROMA-certified trainers and 4 ROMA-certified implementers

13.4. Eligible Entity Use of Data:

Describe how is the state plan to validate the eligible entities that are using data to improve service delivery?

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

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.

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

Indiana utilizes a January-December program year for CSBG. Each September, IHCDA 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 (which, in addition to tri-annual monitoring, is how we annually ensure tripartite compliance). After each initial submission is reviewed, IHCDA 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.

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

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. Most, if not all, of our agencies rely on our state association to complete these assessments. We are supportive of their efforts to increase their ease of use. We are also grateful for their support and cooperation regarding Organizational Standards and the revision of our CSBG Monitoring Tool in 2023

Section 14: CSBG Programmatic Assurances and Information Narrative

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
Administration for Children and Families
Community Services Block Grant (CSBG)

Form Approved
OMB No: 0970-0382
Expires:09/30/2025

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 farm workers, 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."

Note: The State describes this assurance under "State Use of Funds: Remainder/Discretionary," items 7.9 and 7.10

Eligible Entity Service Delivery, Coordination, and Innovation

14.3. 676(b)(3) "Based on information provided by eligible entities in the state, a description of..."

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 followup consultations."

Note: The state describes this assurance in the state linkages and communication section, item 9.3b.

CSBG Eligible Entities rely on their triennial community needs assessment (most recently in 2023) 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.

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

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

Note: The state describes this assurance in the state linkages and communication section, item 9.7.

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. As we review claims, we collect information about other programs that are funded in part by CSBG. 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.

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

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

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

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 initiatives include parenting classes to reduce ACE's (Adverse Childhood Events), partnering with a local university to combine housing and education for low-income mothers (and soon, low-income fathers), Foster Grandparent programs, Individual Development Accounts (IDA's), a community loan center to offer an alternative to predatory lending, and leadership development programs for minority male youth.

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."

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

State Coordination/Linkages and Low-income Home Energy Assistance

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

Note: The state describes this assurance in the state linkages and communication section, items 9.2 and 9.5.

Federal Investigations

14.7. 676(b)(7) Provide "an assurance that the state will permit and cooperate with Federal investigations undertaken in accordance with section 678D." Yes

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

Funding Reduction or Termination

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

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

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

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

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

Eligible Entity Tripartite Board Representation

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

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

The Indiana CSBG Monitoring Tool requires each agency 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 agency to be able to petition for more low-income individuals participation on the tripartite governing board. The Bylaws are reviewed during each CSBG monitoring for Petition for Adequate Representation. In addition, during monitoring, each low-income representatives democratic selection process is reviewed and the process for their selection is verified against the agencies policy for such selection.

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 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."

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

State and Eligible Entity Performance Measurement: ROMA or Alternate system

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

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

Validation for CSBG Eligible Entity Programmatic Narrative Sections

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

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



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

Section 15: Federal Certifications

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
Administration for Children and Families
Community Services Block Grant (CSBG)

Form Approved
OMB No:0970-0382
Expires:09/30/2025

SECTION 15 Federal Certifications

15.1. CERTIFICATION REGARDING 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.

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

15.1. Lobbying

After assurance select a check box:



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

15.2. CERTIFICATION REGARDING 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)

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]

15.2. Drug-Free Workplace Requirements

After assurance select a check box:



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

15.3. 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.

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

3. The prospective lower tier participant shall provide immediate written notice to the person to which this proposal is submitted if at any time the prospective lower tier participant learns that its certification was erroneous when submitted or had become erroneous by reason of changed circumstances.

4. The terms covered transaction, debarred, suspended, ineligible, lower tier covered transaction, participant, person, primary covered transaction, principal, proposal, and voluntarily excluded, as used in this clause, have the meaning set out in the Definitions and Coverage sections of rules implementing Executive Order 12549. You may contact the person to which this proposal is submitted for assistance in obtaining a copy of those regulations.

5. The prospective lower tier participant agrees by submitting this proposal that, should the proposed covered transaction be entered into, it shall not knowingly enter into any lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, declared ineligible, or voluntarily excluded from participation in this covered transaction, unless authorized by the department or agency with which this transaction originated.

6. The prospective lower tier participant further agrees by submitting this proposal that it will include this clause titled "Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion-Lower Tier Covered Transaction," without modification, in all lower tier covered transactions and in all solicitations for lower tier covered transactions.

7. A participant in a covered transaction may rely upon a certification of a prospective participant in a lower tier covered transaction that it is not proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, ineligible, or voluntarily excluded from covered transactions, unless it knows that the certification is erroneous. A participant may decide the method and frequency by which it determines the eligibility of its principals. Each participant may, but is not required to, check the List of Parties Excluded from Federal Procurement and Nonprocurement Programs.

8. Nothing contained in the foregoing shall be construed to require establishment of a system of records in order to render in good faith the certification required by this clause. The knowledge and information of a participant is not required to exceed that which is normally possessed by a prudent person in the ordinary course of business dealings.

9. Except for transactions authorized under paragraph five of these instructions, if a participant in a covered transaction knowingly enters into a lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, suspended, debarred, ineligible, or voluntarily excluded from

participation in this transaction, in addition to other remedies available to the Federal Government, the department or agency with which this transaction originated may pursue available remedies, including suspension and/or debarment.

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

(1) The prospective lower tier participant certifies, by submission of this proposal, that neither it nor its principals is presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from participation in this transaction by any Federal department or agency.

(2) Where the prospective lower tier participant is unable to certify to any of the statements in this certification, such prospective participant shall attach an explanation to this proposal.

15.3. Debarment

After assurance select a check box:



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

15.4. CERTIFICATION REGARDING 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.

15.4. Environmental Tobacco Smoke

After assurance select a check box:



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

THE PAPERWORK REDUCTION ACT OF 1995 (Pub. L. 104-13)

Public reporting burden for this collection of information is estimated to average 10 hours per response, including the time for reviewing instructions, gathering and maintaining the data needed, and reviewing the collection of information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.