



Governor Kim Reynolds
Lt. Governor Adam Gregg
San Wong, Director

NOTICE OF PUBLIC INSPECTION AND PUBLIC HEARING

IOWA COMMUNITY SERVICES BLOCK GRANT PROGRAM

DES MOINES – Iowans have an opportunity to inspect and comment on the revisions to Iowa's FFY 2022-2023 Community Services Block Grant (CSBG) State Plan and Application. The revisions are to subsections 7.1, 7.1a, 7.2, and 7.3.

The purpose of the federal CSBG Program is to provide assistance to states and local communities, working through a network of community action agencies and other neighborhood-based organizations, for the reduction of poverty, revitalization of low-income communities, and the empowerment of low-income families and individuals in rural and urban areas to become fully self-sufficient. The Iowa Department of Human Rights, Division of Community Action Agencies (DCAA) administers Iowa's CSBG Program and is authorized by Iowa law to contract and distribute Iowa's CSBG Program funds to Iowa's community action agencies.

The revisions will be available on the DCAA's website (<https://humanrights.iowa.gov/dcaa/csbg/csbg-resources>) through August 15, 2022. The inspection and comment period are from August 9, 2022, through August 15, 2022. Comments must be e-mailed to the following DCAA address prior to August 16, 2022, to be considered:

E-mail Address: dcaa@iowa.gov

Subject: Comments – CSBG State Plan Revisions

A virtual public hearing on the revisions will be held from 9:00 – 10:00 a.m. on August 16, 2022. A link to the public hearing will be posted on the DCAA's website at least 20 minutes prior to the public hearing start time.

The revisions are subject to change based on comments received and regulations from the U.S. Department of Health and Human Services.

SECTION 7
State Use of Funds

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

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

- Historic
- Base + Formula
- Formula Alone
- Formula with Variables
- Hold Harmless + Formula
- Other, describe: Year One (FFY 2022): FORMULA + FLOOR
Year Two (FFY 2023): FORMULA + FLOORS

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

Year One (FFY 2022)

The following are Iowa's CSBG allocation formula requirements for FFY 2022:

- Iowa shall use poverty-level data (individuals at or below 125% of the U.S. Department of Health and Human Services Poverty Guidelines) from the U.S. Census Bureau's 2010 decennial survey to calculate each Iowa community action agency's percentage of the state's poverty-level population
- Iowa shall use poverty-level data (individuals at or below 125% of the U.S. Department of Health and Human Services Poverty Guidelines) from the U.S. Census Bureau's 2000 and 2010 decennial surveys to calculate:
 - Each agency's change in their percentage of the state's poverty-level population
 - The proportional share of the subsidy for the agencies that are required to subsidize the minimum allocation level
- Iowa's minimum allocation level is \$160,000
- The agencies that had an increase in their percentage of the state's poverty-level population subsidize the minimum allocation level. The following are the agencies that subsidize the minimum allocation level and their proportional share (as a percentage) of the subsidy:

<u>Agency</u>	<u>Subsidy Share (%)</u>
IMPACT Community Action Partnership	60.3650%
Hawkeye Area Community Action Program	25.6413%
Mid-Iowa Community Action	8.9984%
Community Action of Southeast Iowa	4.9953%
- If Iowa's final CSBG annual allotment is less than \$6.57 million, the State CSBG Office, Iowa Commission on Community Action Agencies, Iowa Community Action Association, and the Executive Directors from the agencies may revisit and act on Iowa's CSBG allocation formula requirements

The following are the State CSBG Office's procedures for allocating Iowa's FFY 2022 CSBG allotment to Iowa's community action agencies:

- Step 1: FORMULA: Ninety-six percent (96%) of Iowa's CSBG allotment is allocated to the agencies by their percentage of the state's poverty-level population.

Step 2: MINIMUM ALLOCATION LEVEL (FLOOR): The agencies with an allocation amount less than \$160,000 (Step 1) are identified and their allocation is raised and set at \$160,000.

Step 3: SUBSIDIZING THE MINIMUM ALLOCATION LEVEL (FLOOR):

- 1) The amount of CSBG funds needed to raise the agencies to the minimum allocation level (FLOOR) is calculated. The total is the subsidy amount.
- 2) The subsidy share for each of the agencies required to subsidize the FLOOR is calculated and their allocation is then reduced by the amount of their subsidy share.

Year Two (FFY 2023)

In response to the results of the most recently available census data, and consistent with the State CSBG Office’s plans to reconvene its CSBG allocation formula committee (State CSBG Office, Iowa Community Action Association, and the Executive Directors from Iowa’s community action agencies) to revise Iowa’s CSBG allocation formula requirements using Iowa’s poverty-level data from the U.S. Census Bureau’s 2020 decennial survey, Iowa revised its CSBG allocation formula requirements. As of FFY 2023, the following are Iowa’s CSBG allocation formula requirements:

- Iowa shall use poverty-level data (individuals at or below 125% of the U.S. Department of Health and Human Services Poverty Guidelines) from the U.S. Census Bureau’s 2020 decennial survey to calculate each Iowa community action agency’s percentage of the state’s poverty-level population
- Iowa shall use poverty-level data (individuals at or below 125% of the U.S. Department of Health and Human Services Poverty Guidelines) from the U.S. Census Bureau’s 2010 and 2020 decennial surveys to calculate:
 - Each agency’s change in their percentage of the state’s poverty-level population
 - The proportional share of the subsidy for the agencies that are required to subsidize the minimum allocation levels
- Iowa’s minimum allocation level is \$185,000
- The following are the minimum allocation levels for the agencies that had a decrease in their percentage of the state’s poverty-level population and do not qualify for the \$185,000 minimum allocation:

<u>Agency</u>	<u>Minimum Allocation Level</u>
Community Action of Eastern Iowa	\$705,421
North Iowa Community Action Organization	\$330,926
Northeast Iowa Community Action Corporation	\$260,248
Operation Threshold	\$483,878
Community Action of Southeast Iowa	\$295,773
Upper Des Moines Opportunity	\$424,992
West Central Community Action	\$523,307
Community Action Agency of Siouxland	\$299,391

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

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

- **The minimum allocation levels and subsidy share percentages shall be phased-in over three federal fiscal years (FFY 2023, FFY 2024, and FFY 2025) - Attachment J: Planned Allocations (page 2)**
- If Iowa's final CSBG annual allotment is less than \$7.36 million, the State CSBG Office, Iowa Commission on Community Action Agencies, Iowa Community Action Association, and the Executive Directors from the agencies may revisit and act on Iowa's CSBG allocation formula requirements
- If through federal CSBG reauthorization States may revise the CSBG program poverty line to exceed 125% of the official poverty line, the State CSBG Office, Iowa Commission on Community Action Agencies, Iowa Community Action Association, and Executive Directors from the agencies may revisit and act on Iowa's CSBG allocation formula requirements

The following are the State CSBG Office's procedures for allocating Iowa's FFY 2023 CSBG allotment to Iowa's community action agencies. Iowa's FFY 2023 CSBG distribution and agency allocations worksheet is included on page 2 of Attachment J: Planned Allocations. FFY 2023 is the first year of a 3-year phase-in of Iowa's CSBG allocation formula.

Step 1: **FORMULA:** Ninety-six percent (96%) of Iowa's CSBG allotment is allocated to the agencies by their percentage of the state's poverty-level population.

Step 2: **MINIMUM ALLOCATION LEVEL (FLOOR):** The agencies with an allocation amount less than \$168,333 (Step 1) are identified and their allocation is raised and set at \$168,333.

Step 3: **OTHER MINIMUM ALLOCATION LEVELS (FLOORS):** The following are the FFY 2023 minimum allocation levels for agencies that had a decrease in their percentage of the state's poverty-level population and do not qualify for the \$168,333 minimum allocation:

<u>Agency</u>	<u>Minimum Allocation Level</u>
Community Action of Eastern Iowa	\$720,639
North Iowa Community Action Organization	\$347,571
Northeast Iowa Community Action Corporation	\$275,987
Operation Threshold	\$501,165
Community Action of Southeast Iowa	\$308,635
Upper Des Moines Opportunity	\$442,728
West Central Community Action	\$544,597
Community Action Agency of Siouxland	\$305,280

For these eight agencies, if their allocation amount (Step 1) is less than their minimum allocation level, their allocation is raised and set at their minimum allocation level.

Step 4: **SUBSIDIZING THE MINIMUM ALLOCATION LEVELS (FLOORS):**

- 1) The amount of CSBG funds needed to raise the agencies to the minimum allocation levels (FLOORS) is calculated. The total is the subsidy amount.
- 2) The subsidy share for each of the agencies required to subsidize the FLOORS is calculated and their allocation is then reduced by the amount of their subsidy share. The following are the agencies that subsidize the FLOORS and their proportional share (as a percentage) of the subsidy for FFY 2023:

<u>Agency</u>	<u>Subsidy Share (%)</u>
IMPACT Community Action Partnership	43.7925%
Hawkeye Area Community Action Program	43.4184%
New Opportunities	5.9844%
Mid-Iowa Community Action	5.4551%
Sieda Community Action	1.3496%

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

Yes No

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

Year One (FFY 2022): **96%**

Year Two (FFY 2023): **96%**

Planned CSBG 90 Percent Funds

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

The attached information will be included in the table.

Attachment J: Planned Allocations (page 1)

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

Iowa law (2021 Iowa Acts, House File 895) addresses and provides the requirements for how Iowa’s FFY 2022 and FFY 2023 CSBG allotments are to be distributed and allocated by the State CSBG Office.

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

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

1. Prior to the start of the federal fiscal year the State CSBG Office issues a CSBG contract to each agency. Agencies are issued a contract after their annual CSBG Community Action Plan and Application is accepted by the State CSBG Office. The contracts include the agency’s projected CSBG allocation and a project budget that equals the projected allocation amount.
2. Within 30 calendar days of receiving a CSBG grant award notice from the U. S. Department of Health and Human Services, Administration for Children and Families (ACF), the State CSBG Office will distribute the CSBG allotment, calculate the amount of funds available for each agency, and notify each agency of the amount of CSBG funds currently available for their agency. The amount of CSBG funds provided to the agency in the notification is the maximum amount of funds available for the agency until the State CSBG Office receives additional CSBG grant award notices from ACF.

3. Within 30 calendar days of receipt of Iowa's final CSBG allotment amount from ACF, the State CSBG Office will distribute the CSBG allotment, calculate final agency allocations, and notify each agency of their final CSBG allocation amount for the federal fiscal year. The final amount of CSBG funds provided to the agency in the notification is the maximum amount of funds available for their CSBG contract. Using their final allocation amount, agencies are directed and allowed at least 30 calendar days from the State CSBG Office's notification to prepare and submit a CSBG contract budget amendment request to the State CSBG Office. Once a request is received, reviewed, and accepted by the State CSBG Office, the State CSBG Office will issue a CSBG contract amendment that includes the agency's final allocation amount and amended project budget. The State CSBG Office issues these contract amendments within 30 calendar days of the State CSBG Office's receipt of an acceptable budget amendment request.

PLANNED ALLOCATIONS

CSBG ELIGIBLE ENTITY	YEAR ONE (FFY 2022) FUNDING AMOUNT	YEAR TWO (FFY 2023) FUNDING AMOUNT
New Opportunities	\$254,211	\$255,330
HACAP	\$1,323,837	\$1,337,133
CAEI	\$728,247	\$720,639
MATURA	\$160,000	\$168,333
MICA	\$554,937	\$557,223
Mid-Sioux Opportunity	\$160,000	\$168,333
NICAO	\$355,893	\$347,571
NEICAC	\$283,855	\$275,987
Operation Threshold	\$509,807	\$501,165
IMPACT	\$1,236,726	\$1,256,448
SCICAP	\$160,000	\$168,333
CASEI	\$315,065	\$308,635
Sieda	\$378,319	\$378,221
UDMO	\$451,594	\$442,728
WCCA	\$555,241	\$544,597
CAAS	\$308,224	\$305,280
TOTAL	\$7,735,956	\$7,735,956

Iowa's CSBG Allotment \$8,058,287 FFY 2023 (first year of 3-year phase-in)
 CSBG Eligible Entities \$7,735,956 96%
 State CSBG Office \$322,331 4%

CSBG ELIGIBLE ENTITY	2020 ACS 125% IND		SUBSIDY		SUBSIDY		SUBSIDY SHARE ADJUSTMENTS	FUNDING AMOUNT
			MINIMUM FLOOR	MINIMUM FLOOR	OTHER CAA FLOORS	OTHER CAA FLOORS		
New Opportunities	3.5195%	\$272,267					5.9844% (\$16,937)	\$255,330
HACAP	18.8731%	\$1,460,015					43.4184% (\$122,882)	\$1,337,133
CAEI	9.0592%	\$700,816			\$720,639	\$19,823		\$720,639
MATURA	1.3463%	\$104,149	\$168,333	\$64,184				\$168,333
MICA	7.4026%	\$572,662					5.4551% (\$15,439)	\$557,223
Mid-Sioux Opportunity	1.9240%	\$148,840	\$168,333	\$19,493				\$168,333
NICAO	4.2075%	\$325,490			\$347,571	\$22,081		\$347,571
NEICAC	3.2971%	\$255,062			\$275,987	\$20,925		\$275,987
Operation Threshold	6.1836%	\$478,361			\$501,165	\$22,804		\$501,165
IMPACT	17.8438%	\$1,380,389					43.7925% (\$123,940)	\$1,256,448
SCICAP	1.7019%	\$131,658	\$168,333	\$36,675				\$168,333
CASEI	3.7599%	\$290,864			\$308,635	\$17,771		\$308,635
Sieda	4.9385%	\$382,040					1.3496% (\$3,820)	\$378,221
UDMO	5.4197%	\$419,266			\$442,728	\$23,462		\$442,728
WCCA	6.6759%	\$516,445			\$544,597	\$28,152		\$544,597
CAAS	3.8474%	\$297,633			\$305,280	\$7,647		\$305,280
TOTAL	100.0000%	\$7,735,956		\$120,352		\$162,666	100.0000% (\$283,018)	\$7,735,956

TOTAL SUBSIDY AMOUNT: \$283,018

Iowa's CSBG Allotment \$8,058,287 FFY 2024 (second year of 3-year phase-in)
 CSBG Eligible Entities \$7,735,956 96%
 State CSBG Office \$322,331 4%

CSBG ELIGIBLE ENTITY	2020 ACS 125% IND		SUBSIDY		SUBSIDY		SUBSIDY SHARE ADJUSTMENTS	FUNDING AMOUNT
			MINIMUM FLOOR	MINIMUM FLOOR	OTHER CAA FLOORS	OTHER CAA FLOORS		
New Opportunities	3.5195%	\$272,267					6.4119% (\$15,817)	\$256,450
HACAP	18.8731%	\$1,460,015					44.4230% (\$109,583)	\$1,350,432
CAEI	9.0592%	\$700,816			\$713,029	\$12,213		\$713,029
MATURA	1.3463%	\$104,149	\$176,668	\$72,519				\$176,668
MICA	7.4026%	\$572,662					5.3312% (\$13,151)	\$559,511
Mid-Sioux Opportunity	1.9240%	\$148,840	\$176,668	\$27,828				\$176,668
NICAO	4.2075%	\$325,490			\$339,248	\$13,758		\$339,248
NEICAC	3.2971%	\$255,062			\$268,116	\$13,054		\$268,116
Operation Threshold	6.1836%	\$478,361			\$492,520	\$14,159		\$492,520
IMPACT	17.8438%	\$1,380,389					42.2460% (\$104,213)	\$1,276,176
SCICAP	1.7019%	\$131,658	\$176,668	\$45,010				\$176,668
CASEI	3.7599%	\$290,864			\$302,203	\$11,339		\$302,203
Sieda	4.9385%	\$382,040					1.5879% (\$3,917)	\$378,123
UDMO	5.4197%	\$419,266			\$433,858	\$14,592		\$433,858
WCCA	6.6759%	\$516,445			\$533,951	\$17,506		\$533,951
CAAS	3.8474%	\$297,633			\$302,335	\$4,702		\$302,335
TOTAL	100.0000%	\$7,735,956		\$145,357		\$101,324	100.0000% (\$246,681)	\$7,735,956

TOTAL SUBSIDY AMOUNT: \$246,681

Iowa's CSBG Allotment \$8,058,287 FFY 2025+ (third year of 3-year phase-in)
 CSBG Eligible Entities \$7,735,956 96%
 State CSBG Office \$322,331 4%

CSBG ELIGIBLE ENTITY	2020 ACS 125% IND		SUBSIDY		SUBSIDY		SUBSIDY SHARE ADJUSTMENTS	FUNDING AMOUNT
			MINIMUM FLOOR	MINIMUM FLOOR	OTHER CAA FLOORS	OTHER CAA FLOORS		
New Opportunities	3.5195%	\$272,267					6.9875% (\$14,698)	\$257,569
HACAP	18.8731%	\$1,460,015					45.7741% (\$96,287)	\$1,363,728
CAEI	9.0592%	\$700,816			\$705,421	\$4,605		\$705,421
MATURA	1.3463%	\$104,149	\$185,000	\$80,851				\$185,000
MICA	7.4026%	\$572,662					5.1650% (\$10,865)	\$561,797
Mid-Sioux Opportunity	1.9240%	\$148,840	\$185,000	\$36,160				\$185,000
NICAO	4.2075%	\$325,490			\$330,926	\$5,436		\$330,926
NEICAC	3.2971%	\$255,062			\$260,248	\$5,186		\$260,248
Operation Threshold	6.1836%	\$478,361			\$483,878	\$5,517		\$483,878
IMPACT	17.8438%	\$1,380,389					40.1643% (\$84,487)	\$1,295,902
SCICAP	1.7019%	\$131,658	\$185,000	\$53,342				\$185,000
CASEI	3.7599%	\$290,864			\$295,773	\$4,909		\$295,773
Sieda	4.9385%	\$382,040					1.9091% (\$4,016)	\$378,024
UDMO	5.4197%	\$419,266			\$424,992	\$5,726		\$424,992
WCCA	6.6759%	\$516,445			\$523,307	\$6,862		\$523,307
CAAS	3.8474%	\$297,633			\$299,391	\$1,758		\$299,391
TOTAL	100.0000%	\$7,735,956		\$170,353		\$40,000	100.0000% (\$210,353)	\$7,735,956

TOTAL SUBSIDY AMOUNT: \$210,353