

**From:** [Hassett, Seth \(ACF\)](#)  
**To:** [Rita Gonzales-Garza](#)  
**Cc:** [Roneika Carr](#); [CSBG States](#)  
**Subject:** RE: Follow-up to CSBG Disaster Supplemental Conference Call  
**Date:** Thursday, December 12, 2019 1:53:59 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)

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Please see my answers in red below each question. Thanks.

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**From:** Rita Gonzales-Garza <[rita.garza@tdhca.state.tx.us](mailto:rita.garza@tdhca.state.tx.us)>  
**Sent:** Wednesday, December 11, 2019 12:20 PM  
**To:** Hassett, Seth (ACF) <[Seth.Hassett@ACF.hhs.gov](mailto:Seth.Hassett@ACF.hhs.gov)>  
**Cc:** Carr, Roneika (ACF) (CTR) <[Roneika.Carr@acf.hhs.gov](mailto:Roneika.Carr@acf.hhs.gov)>; CSBG States <[CSBGStates@acf.hhs.gov](mailto:CSBGStates@acf.hhs.gov)>  
**Subject:** RE: Follow-up to CSBG Disaster Supplemental Conference Call

Mr. Hassett:

We would appreciate some information on question 2.2 and 2.3 and about Stage 1 use of funds.

For Stage 1 funding:

I do see in the November 19, 2019 Memo on page 4 it says Stage 1 Initial Planning, Needs Assessment, and Cost Documentation "States may use up to \$55,000 or 5% for direct expenses at the state level to assess needs and conduct administrative and planning activities.

- Is this Stage 1 money only for the time and work related to planning work done prior to Stage 2 and 3 work? Is there a time period for completing Stage 1? Also, at the time that the State is

*The only time constraint currently on Stage 1 funds is that the funds will need to be obligated and expended by September 30, 2020. This is because funds are available in the year in which they were awarded and the subsequent fiscal year. The State has flexibility on how to use the Stage 1 funds, but we are making available up to \$100K (with an application) so that the state has money to begin meeting and reimbursing for immediate expenses as you complete a needs assessment and distribution plan for the funds.*

- The webinar had a slide which stated "States may use funds to document and reimburse any immediate costs incurred by eligible entities." What is considered "immediate costs"? What if one of the eligible entities already assisted persons impacted by the storm? Can this Stage 1 money be used to reimburse them for these client related expenses for persons that were already assisted persons prior to the State receiving the grant that were impacted or is Stage 1 money only to be used for expenses related to planning and needs assessment?

*The state has significant discretion on the most important priority uses of the funds up to \$100,000. The only major limitation is that the state can't use more than \$55,000 for its own administrative costs. This may include costs related to needs assessment and staff time. It can also include reimbursement for prior costs incurred to address needs directly resulting from the disaster. Stage 1 funds can be used to reimburse for client-related expenses or other costs that were incurred by eligible entities (and you will also be able to use stage 2 funds for this purpose. The key issue will be to have a plan for cost documentation that clearly shows that the service/cost was directly related to a disaster need and is directed to income-eligible population.*

On question 2.2,

- is 2.2 question only about the State's needs assessment and **not about the assessment that will be completed by the eligible entities** that will receive the funds? And, of the 95% of the money received for Stage 1 which must be provided to eligible entities impacted by the disasters, will that only be to cover costs that eligible entities incur to conduct their needs assessment and planning related activities? Can this Stage 1 money also be used for community outreach activities to inform the community of the available assistance and to try to identify households that may be eligible for assistance?

*The question applies to the overall needs assessment process. In the state office, it includes work that will be done by the state to decide what percentage of supplemental funding will need to go to which eligible entities throughout the full project). You will also need to request needs assessments and disaster community action plans from the eligible entities with decisions on how they will spend funds.*

*You are not required to allocate 95% of the money in stage 1 to the eligible entities. The state may use the higher of \$55K or 5%. Since you are only getting \$100K in Stage 1, that means you could use more than 5% of the funds for administrative costs. Once the state receives additional funds in stage 2 and 3, it is possible that 5% of the total award will exceed \$55K. . I can talk this through by phone if needed.*

*You might want to consider a two step process. For example, the state might devote some funds to its own state-level needs assessment. This would primarily be to determine an allocation formula. A second step might be to share the formula with the local agencies and require them to conduct a needs assessment and propose a disaster community action plan.*



For 2.3 questions:

- Is it HHS-OCS expectation that the State must receive documentation of any expenses prior to reimbursing an eligible entity?

*Yes, for any past costs already incurred from the date of the disaster the eligible entities will need to provide documentation and the state will need to have a plan to review. The state has discretion in proposing the documentation that will be required and the process for review. Our assumption is that these are not expenses that were previously approved by the state and the state will need to have reasonable information that the costs were directly related to the disaster and were for an eligible population.*

- Is HHS-OCS expecting that the State review cost documentation prior to reimbursing any funds to eligible entities?

*Yes.*

- Will the State be able to provide 30 day advance funding as we do with the regular CSBG funds (expenses planned for upcoming 30 days)?

*The state may administer consistent with its existing policies and procedures for CSBG and should note any proposed deviation or modification to its existing policies in its application.*

- As the State does for the regular CSBG allotment, would it be acceptable if the State required a monthly performance and expenditure report and not require submission of documentation related to expenses? The State would require that the documentation on expenditures and client records be maintained and available for monitoring reviews or desk reviews. During monitoring reviews or desk reviews, typically a sampling of expenditures is completed and a sampling of client records. If HHS-OCS is requiring that the State monitor all transactions related to the grant, please let us know. We did see in one of the communications that HHS-OCS may monitor some of the States. Any guidance you can provide would be appreciated.

*For new services and activities, the state has discretion to request a disaster community action plan and administer consistent with the process for your regular CSBG reporting and reimbursement. We can discuss with you, or arrange a consultation with our financial operations staff if you have additional operational issues you would like to discuss.*



Thank you for your guidance.

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[Texas Department of Housing & Community Affairs - TDHCA](#)

**About TDHCA**

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**From:** Hassett, Seth (ACF) <[Seth.Hassett@acf.hhs.gov](mailto:Seth.Hassett@acf.hhs.gov)>

**Sent:** Wednesday, December 11, 2019 11:30 AM

**To:** Rita Gonzales-Garza <[rita.garza@tdhca.state.tx.us](mailto:rita.garza@tdhca.state.tx.us)>

**Cc:** Carr, Roneika (ACF) (CTR) <[Roneika.Carr@acf.hhs.gov](mailto:Roneika.Carr@acf.hhs.gov)>; Gavin Reid <[gavin.reid@tdhca.state.tx.us](mailto:gavin.reid@tdhca.state.tx.us)>; CSBG States <[CSBGStates@acf.hhs.gov](mailto:CSBGStates@acf.hhs.gov)>

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Yes. 3.3 is not about direct services to individuals and families. Some examples of community level activities might involve:

- Ongoing assessment of needs;
- Participation in an unmet needs committee;
- Public education about available resources;
- A community resource fair;
- Participation in a recovery planning coalition;
- Other activities identified by the CAA that do not include an intake and eligibility determination for individual/family services but are designed to identify and address needs of low-income people in the community who were impacted by the disaster.

This is not an exhaustive list. In general, any community-level strategies should be identified by the CAAs based on a needs assessment.

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**From:** Rita Gonzales-Garza <[rita.garza@tdhca.state.tx.us](mailto:rita.garza@tdhca.state.tx.us)>

**Sent:** Wednesday, December 11, 2019 9:23 AM

**To:** Hassett, Seth (ACF) <[Seth.Hassett@ACF.hhs.gov](mailto:Seth.Hassett@ACF.hhs.gov)>

**Cc:** Carr, Roneika (ACF) (CTR) <[Roneika.Carr@acf.hhs.gov](mailto:Roneika.Carr@acf.hhs.gov)>; Gavin Reid <[gavin.reid@tdhca.state.tx.us](mailto:gavin.reid@tdhca.state.tx.us)>; CSBG States <[CSBGStates@acf.hhs.gov](mailto:CSBGStates@acf.hhs.gov)>

**Subject:** RE: Follow-up to CSBG Disaster Supplemental Conference Call

Thank you Mr. Hassett. It does help. So then 3.3 Community-Level Disaster Recovery Services is not about direct services to individuals and families? If Community-Level Disaster Recovery Services isn't about direct services to persons impacted by the storms, then can you please provide me with any information on what Community-Level Disaster Recovery Services would

entail?

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**From:** Hassett, Seth (ACF) <[Seth.Hassett@acf.hhs.gov](mailto:Seth.Hassett@acf.hhs.gov)>

**Sent:** Wednesday, December 11, 2019 11:05 AM

**To:** Rita Gonzales-Garza <[rita.garza@tdhca.state.tx.us](mailto:rita.garza@tdhca.state.tx.us)>

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Ms. Garza,

The eligible entities can provide individual/family services as well as community-level services. **Question 3.3** is basically asking if a CAA is proposing a service that is **not a direct service to individuals and families**, how they will ensure that the service is targeted to address needs of low-income people. There is significant flexibility depending upon the nature of the activity. We just need to know how you and the Community Action Agencies will be ensuring that the effort is focused on the needs of low-income people.

One way you may be able to handle this is to ask the CAAs to provide you with a needs assessment related to the disaster, proposed services and strategies related to the disaster, and a process for eligibility verification and/or targeting of services as appropriate.

The bottom line is that eligible entities can provide any necessary service or activity they might provide under the regular CSBG award, but these funds must be directed to meet disaster needs.

I don't know if this helps, but if you need, please let us know and we can arrange a webex to discuss in more detail.

Thanks,  
Seth

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**From:** Rita Gonzales-Garza <[rita.garza@tdhca.state.tx.us](mailto:rita.garza@tdhca.state.tx.us)>

**Sent:** Wednesday, December 11, 2019 8:47 AM

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**Subject:** RE: Follow-up to CSBG Disaster Supplemental Conference Call

Mr. Hassett:

In reviewing the documents that have been provided to date, I'm still not clear on what types can be provided with the funds. Are there various categories of assistance besides Community-Level Disaster Recovery Services. Is "Community-Level Disaster Recovery Services" the only category of assistance and therefore would this encompass direct client assistance of various types? What other types of assistance are covered under Community-Level Disaster Recovery Services"? I am trying to determine how best to respond to question 3.3 and any guidance you can provide would be appreciated. I did see the examples that were

provided in the CSBG Disaster Supplemental TA Consultation.



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**From:** Hassett, Seth (ACF) <[Seth.Hassett@acf.hhs.gov](mailto:Seth.Hassett@acf.hhs.gov)>

**Sent:** Tuesday, December 10, 2019 2:39 PM

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**Subject:** Follow-up to CSBG Disaster Supplemental Conference Call

Ms. Garza and Mr. Reid,

I am sending this message as a follow-up to our Webex consultation last week regarding the Community Services Block Grant (CSBG) disaster supplemental funding resulting from the Additional Supplemental Appropriations for Disaster Relief Act, 2019 [Public Law 116-20]. As discussed, this is the first disaster supplemental appropriation to provide funds through CSBG and the "Stage 1" application due date is December 17, 2019. Please let us know if you anticipate that the state will not be able to submit by that date.

As discussed, consistent with the general purposes of CSBG and the specific appropriation instructions, this funding will support a range of locally identified services and strategies focused on the needs of people with low-income and needs directly resulting from the Presidentially-declared disaster. These funds will support ongoing community recovery after the conclusion of emergency response efforts.

Attached are brief notes from our discussion for technical assistance purposes. Please let us know if you have any difficulty accessing these materials. We have included information on potential cost strategies that we included in the Webex.

In addition, OCS has updated the technical assistance application template, which is also attached.

As discussed, if you have follow-up questions, please email to [seth.hassett@acf.hhs.gov](mailto:seth.hassett@acf.hhs.gov) and [Roneika.carr@acf.hhs.gov](mailto:Roneika.carr@acf.hhs.gov) and cc to [CSBGStates@acf.hhs.gov](mailto:CSBGStates@acf.hhs.gov). If you would like to arrange a follow-up webex consultation, please email us and we will work to schedule.

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