

CSBG Disaster Supplemental Pre-Application Technical Assistance Call

Date of Call: December 9, 2019

State: North Carolina

Participants: Valerie Powell, Seth Hassett [other participants can be added]

Items Identified by State for Consultation

The state reports that some CSBG eligible entities have been impacted and have been using general CSBG funds to address needs. A general update is requested on CSBG supplemental application procedures and requirements.

Other Recommended Key Discussion Items

1. State Needs Assessment Process

- **Available Data Sources**
- **Stage 1 Requirements**

Notes

OCS reviewed the technical assistance template and discussed information needed for the stage one application. The state is not expected to have completed a formula for distribution of funds, but needs to describe the needs assessment process, what data sources will be considered, and what organizations will be involved in conducting a needs assessment.

A state-level needs assessment will focus on criteria for determining the amount to go to each eligible entity. Each eligible entity should assess needs and develop a plan for appropriate services and strategies based on the disaster impact and ongoing needs in the community.

2. Cost Documentation Procedures

- **OCS Example**
- **Recommended Activities**

Notes

OCS provided examples of a sample cost strategy as an example for technical assistance purposes. Each state must develop a cost documentation strategy for eligible costs and improper payment monitoring that is specific to its CSBG system and disaster plan. Examples discussed are outlined below.

Individual and Family Service Costs Examples

Examples: short-term emergency rental assistance for displaced families, case management services for families recovering from disaster impact, transportation assistance for disaster impacted families, child care for disaster-impacted families, employment and training support for individuals who have lost employment as a result of the disaster.

- *The costs supports a service to address a need directly-resulting from the Presidentially-declared disaster as identified in the CSBG Disaster Community Needs Assessment.*

- *The cost is for a service that was included in a state-approved CSBG Disaster Community Action Plan.*
- *The eligible entity has confirmed that the individual(s) served meet income eligibility requirements and any eligibility requirements for the disaster-related service (e.g. located in a disaster-impacted area). For example, the eligible entity has reviewed identification documents, records of income, or attestation documents consistent with official state procedures.*
- *The approved service is not eligible for reimbursement through the Federal Emergency Management Agency (FEMA), private insurance, or self-insurance. (E.g. the type of service is not reimbursed by FEMA, the timeframes do not fall within FEMA restrictions, or the cost is for a portion of services not otherwise reimbursed through FEMA, private insurance).*

Community-Level Activity Costs Examples

Examples: A community assistance fair, public education materials, participation in an unmet needs committee

- *The costs supports an activity to address a need directly-resulting from the Presidentially-declared disaster as identified in the CSBG Disaster Community Needs Assessment.*
- *The cost is for an activity that was included in a state-approved CSBG Disaster Community Action Plan.*
- *The activity is specifically-targeted to address the needs of a low-income population directly impact the by disaster (e.g. a geographic area with over 50% of the population in poverty, a school or school district with a high concentration of low-income families, education or advocacy for needs of low-income people in a larger disaster recovery effort).*
- *The approved service is not eligible for reimbursement through the Federal Emergency Management Agency (FEMA), private insurance, or self-insurance. (e.g. the type of service is not reimbursed by FEMA, the timeframes do not fall within FEMA restrictions, or the cost is for a portion of services not otherwise reimbursed through FEMA, private insurance).*

Construction or Infrastructure Repair

Example: Repair of a Community Action Agency facility impact by a disaster

- *The cost addresses damage directly resulting from the Presidentially-declared disaster.*
- *The state requested and received a federal waiver to allow the use of CSBG funds for a permanent property improvement.*
- *The repair or reconstruction cost is not eligible for reimbursement through the Federal Emergency Management Agency (FEMA), private insurance, or self-insurance.*
- *If applicable, a Notice of Federal Interest has been filed on the property.*

Potential Improper Payment Testing Systems

Although OCS does not currently expect that these funds will be subject to a national error rate reporting, states should be prepared to test expenditures as part of oversight and monitoring. Examples or possible approaches are described below:

- *State verifies required documentation collected for a random sample of service records and if necessary extrapolates a disallowance based on the percentage of random sample that are considered ineligible; or*
- *State compares all applicable costs to a state or federal database of disaster assistance; or*
- *State compares a random sample of costs to a state or federal database of disaster*

assistance and if necessary extrapolates a disallowance based on the percentage of random sample that are considered ineligible.

Please note that the appropriate strategy may differ depending upon the types of services to be provided.

3. Eligibility Criteria - Statutory Requirements

Notes

OCS reviewed the income eligibility criteria. Consistent with the regular CSBG program, each state may identify income eligibility up to 125% of the federal poverty line. The state may also describe special considerations or issues that may apply to disaster-related services.

4. Assurances and Certifications - Statutory Requirements

Notes

OCS reviewed the statutory requirements for assurances and certifications. With the exception of Section 676(b)(8) which applied to termination or reduction of funds, all other standard assurances for CSBG are required. If no change is made the assurance from the accepted state plan, the state may check a box noting not changes. If modifications are being made based on disaster recovery efforts, the state can describe in a brief narrative.

5. Next Steps

Notes

- *OCS will provide an updated version of the CSBG Disaster Supplemental Application fillable PDF technical assistance template.*