



NATIONAL ASSOCIATION FOR STATE COMMUNITY SERVICES PROGRAMS

Member Only Conversation on COVID-19

March 25, 2020



AGENDA

- ❖ COVID-19 Update
- ❖ State Options
- ❖ Legislative Update
- ❖ CSBG Supplemental
- ❖ Reporting
- ❖ Resources



HELP

SUPPORT

ADVICE

GUIDANCE

COVID-19 Update

OCS will issue guidance by the end of this week.

Most state offices are working from home or have limited staff in the office.

Most agencies are limiting services to essential services only, engaged in telework, or are closed to the public.

Relief package is very close to final and supplemental CSBG funds will be coming.

COVID-19: What to do



Put Safety First



Refer to state directives



Stay informed



Develop Communication Strategies



Develop a plan



Develop Guidance for Agencies



Be mindful

COVID-19: State Flexibilities

- **Eligibility**: While states cannot waive the 125% of FPL requirement, states may revise eligibility documentation requirements or calculation methodologies
 - Example: State is now allowing self-attestation of meeting income requirements. May or may not include follow up at a later time.
 - Example: State is allowing for presumptive eligibility based on job loss or other unemployment due to COVID-19.
 - Example: State has reduced income verification documentation from 6 months to 1 month.

COVID-19: State Flexibilities

- **Board Vacancies:** States may need to allow for longer board vacancies due to virus impacts. Refer to your state policy for extenuating circumstances/extensions.
- **Agency Administrative Caps:** Although the federal GPRA target for administrative costs is 20%, CSBG does not have a set administrative cap at the federal level. States may determine that administrative caps need to be raised to allow agencies to cover PTO, costs associated with maintaining clean and safe facilities, and other virus-related administrative costs.

COVID-19: State Flexibilities

- **Contract Requirements:** Unless within state or federal law, States can amend contract requirements to allow for needed flexibility:
 - Required prior authorization to amend budgets/plans
 - Open Meetings Requirements
 - Administrative Caps

COVID-19: State Flexibilities

- **Organizational Standards:** States have authority to determine what “meets” an organizational standard.
- **Community Needs Assessments:** Criteria for what constitutes a comprehensive community needs assessment vary by state- the state has authority to revise requirements (outside of those required in Org Standards) as appropriate

COVID-19: State Flexibilities

- **Discretionary Funding:** As agencies are requesting additional funds to address the crisis and its impacts, states are redirecting discretionary dollars to support local response.

Legislative Update



The President has signed [HR 6201](#), the Families First Coronavirus Response Act (FFCRA). It includes:

- An extensive paid leave component that is two fold: new emergency sick leave, as well as an expansion of the existing Paid Family and Medical Leave Act (FMLA).
- Free coronavirus testing and other healthcare supports for those with and without insurance.
- Additional funding for WIC, TEFAP and Senior Nutrition Programs.

Legislative Update



- A third coronavirus relief package is very close to being final.
- We are seeing additional funding for CSBG along with direct payments to Americans, small business loans, deferred payments and additional mortgage or rent supports, and more.
- CSBG is identified as receiving \$1 billion dollars from this package.
- This is the exact same amount as received in ARRA, but this time there is state admin and discretionary.

Supplemental Considerations

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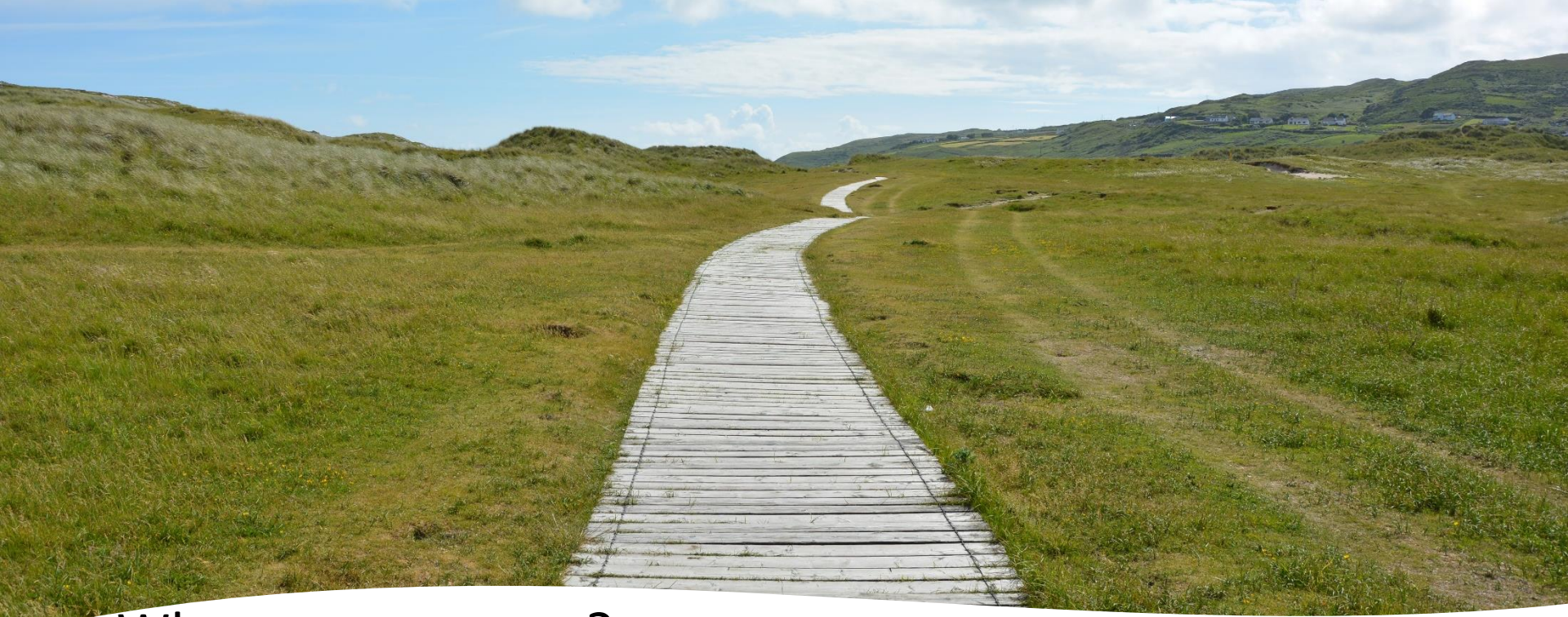
- While the supplemental raises the income guidelines from 125% to 200% FPL, this only applies to supplemental funds and not regular CSBG Allocations.
- The bill allows for CSBG to be spent over two years (FY20 and FY21).
- In supplementals, all regular rules of the grant apply unless otherwise specified by Congress in the Bill.
 - This means states will likely need to develop state plans in OLDC to receive Supplemental Funding.
 - States will also need to be prepared to carry out all normal functions of CSBG, including monitoring and reporting of these funds.
- Begin planning now!
 - Legislature approval
 - Contracts
 - Invoicing
 - Policy and Guidance



Annual report update

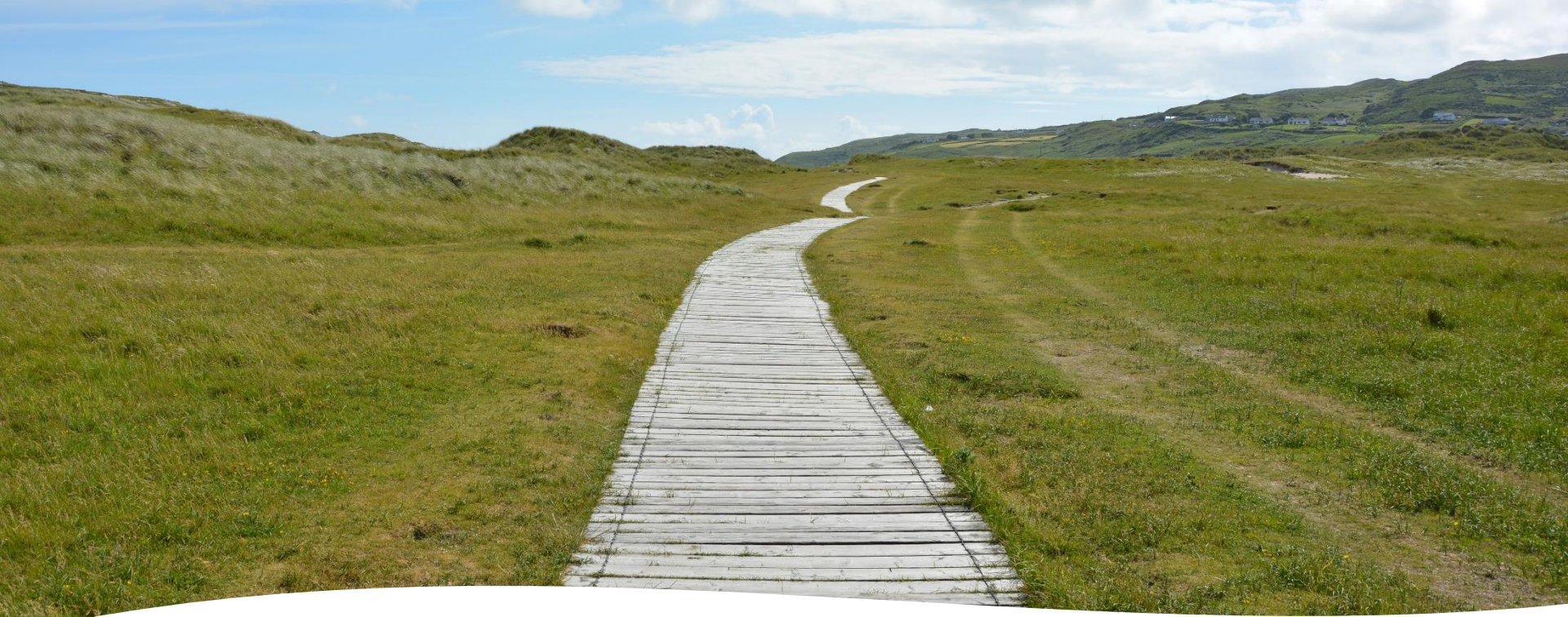
States who do
not have a M2
and M4
review memo:

- Arizona
- Arkansas
- California
- Colorado
- Florida
- Georgia
- Indiana
- Louisiana
- Maryland
- Mississippi
- Nebraska
- Nevada
- New Jersey
- New York
- North Carolina
- Texas
- Virginia
- Washington
- Wyoming

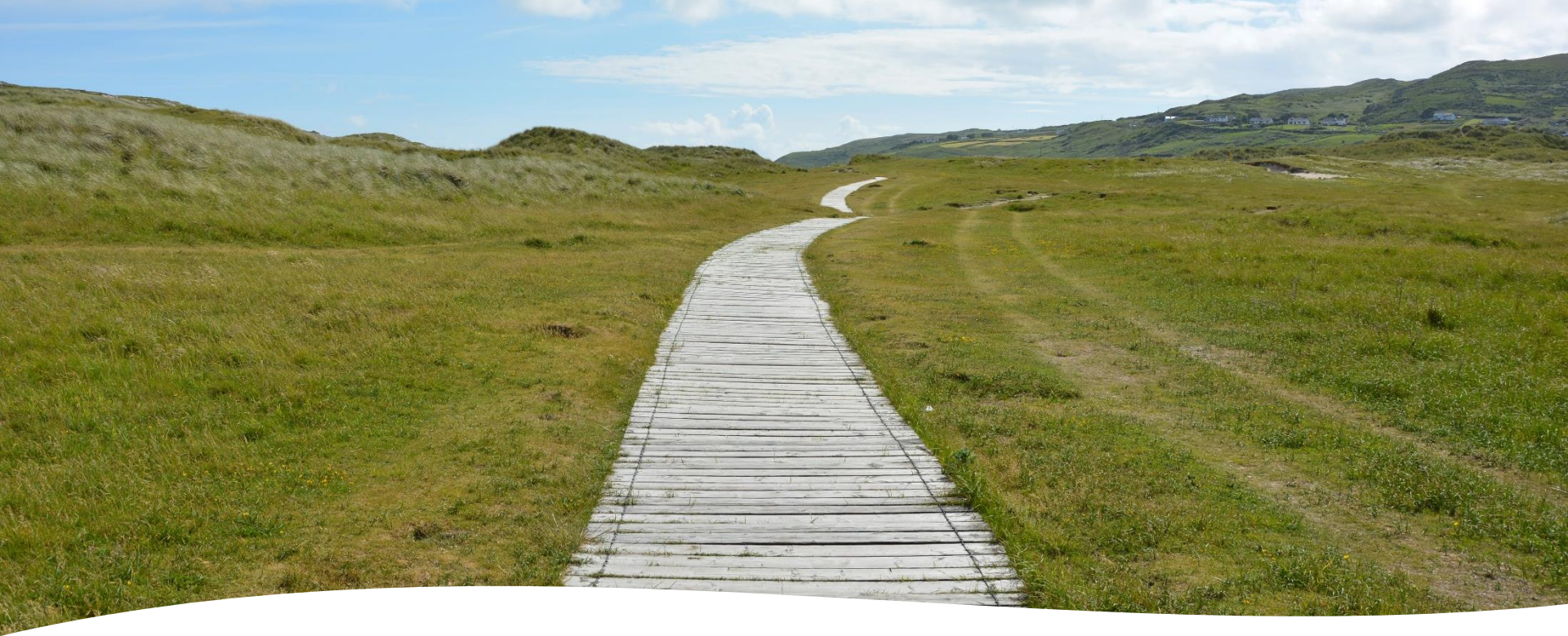


Where are we now?

- OCS is continuing to move forward with reviewing FY18 data.
- Some states have been able to complete their review memos
- The states who have not received a memo are still in process with uploading their missing data.

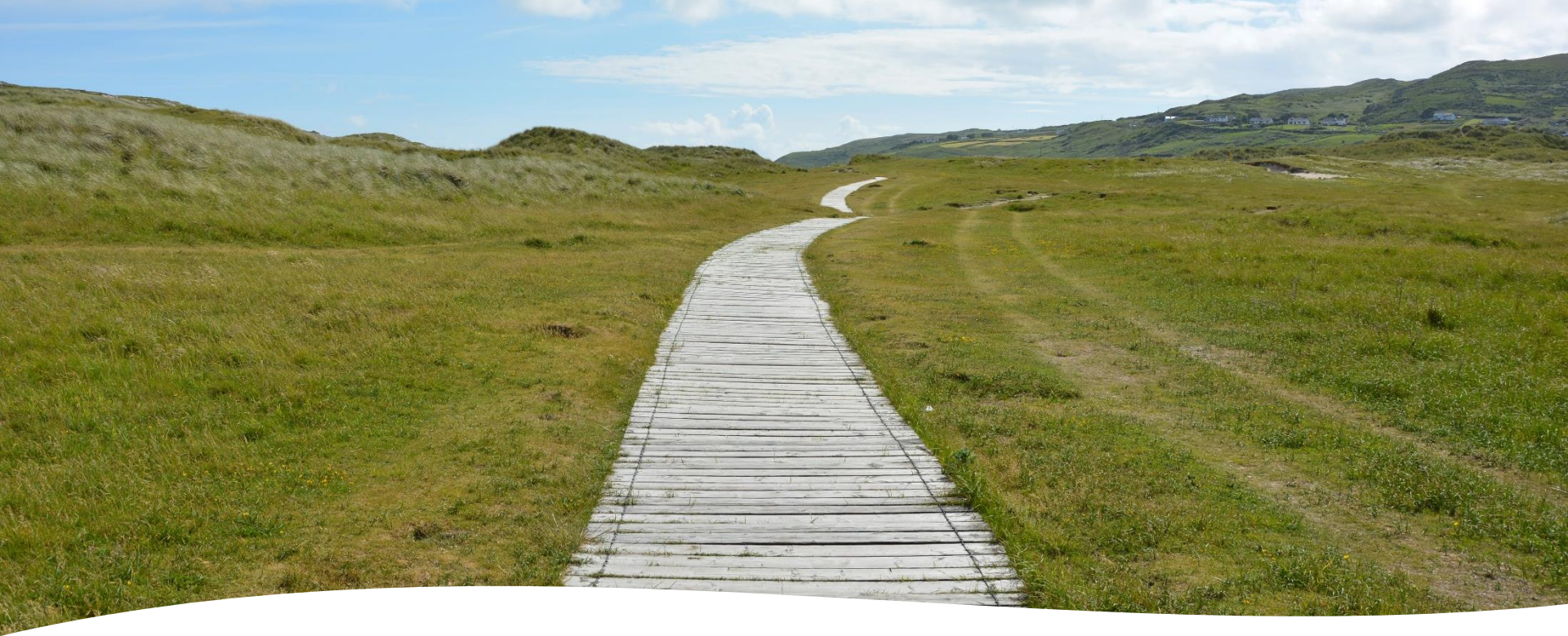


- NASCSP has advocated that OCS finalize the FY18 data.
- It is important to let your OCS Program Specialist know what you can and can't do as it relates to the FY18 review memo.
- It is okay to tell OCS that this is not a priority right now.



Where are we going:

- Working with OCS to test the FY19 reporting forms and XML against OLDC
 - SmartForms will not be released to states until the final testing has been completed.



Reminder:

- **There is no resubmission of the FY18 initiatives.**
The next submission of Module 3 is by June 26th for FY19.
- NASCSP was a part of the review process and is happy to schedule a consultation on the memos.



Tools and Resources



ABOUT

Coronavirus Resources



Statement From NASCSPP on Coronavirus (COVID-19)

We understand that State CSBG and WAP Offices may be concerned with preparing for the coronavirus: as employers, service providers, and community leaders. NASCSPP is supporting state CSBG and WAP offices as they work to respond to the emerging needs of their state networks and follow state level directives coming out of governors' offices and state departments of health. NASCSPP is also in direct contact with federal staff at the Office of Community Services (OCS) and Department of Energy (DOE) in order to monitor and quickly disseminate federal guidance for state grantees. NASCSPP will continue to work closely with the national partners and state associations to ensure we provide the critical information and services needed in our network during this time. We are here to help – for anything related to WAP state offices please contact [Amy Klusmeier](#), and for CSBG state offices please contact [Maribeth Schneber-Rhemrev](#).

NASCSP COVID 19 FAQ

COVID-19 FAQ for CSBG

NASCSP is aware of the unique challenges posed by the COVID-19 pandemic and is here to support your state and networks as you respond. NASCSP is working with OCS and the National Partners to develop tools, resources, guidance, and support for you. This document is one tool you can use to find answers to commonly asked questions about CSBG in relation to COVID-19. This document will be updated regularly as additional guidance and information become available.

Can the CSBG eligibility requirements be adjusted?

The 125% of the Federal Poverty Level is a statutory requirement and therefore cannot be waived by state offices. However, states may revise eligibility documentation requirements or calculation methodologies. See CAPLAW's [publication on client eligibility](#) for additional considerations. [CSBG IM #154](#) also provides guidance to states on revising eligibility criteria in times of crisis or disaster.

Will CSBG receive additional federal allocations to respond to COVID-19?

There is potential that CSBG may receive supplemental funding. While specific details and timelines are not yet available, typically supplemental funds are allocated by Congress with a clear intended purpose, and then the funds would be able to be used just like normal CSBG for that purpose. Typically, supplementals follow all normal funding rules unless Congress specifies otherwise. We will keep you posted as this unfolds.



- CAPLAW has issued [an extensive document](#) on how paid leave under the FFCRA will impact the CSBG network.
 - They will be holding a webinar on the Paid Leave provisions on Thursday March 26th from 1pm-2:30pm ET.
 - [Register here](#)
- NCAF is hosting a conversation on CSBG in the Coronavirus Aid Package Thursday, March 26th at 12pm
 - [Register Here](#)
- Community Action Partnership is hosting a webinar on crisis communications on Friday, March 27th at 2pm
 - [Register here](#)



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Discussion