

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.

Is there CSBG-specific COVID-19 guidance available to states?

OCS plans to release an Information Memorandum (IM) by Monday, March 23, 2020. While awaiting this guidance, NASCSP held a regional call with OCS to provide an opportunity for states to tell OCS what sort of guidance would be most beneficial at this time. To listen to the regional call, click [here](#). In the meantime, NASCSP will continue advocating on behalf of state administrators of CSBG to solicit a prompt response from OCS around these issues, and we will share information as soon as it is 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.

To note, multiple funding streams used by the Community Action Network are receiving supplemental and emergency funding. Funding streams included in recent aid packages include several nutrition programs including Meals on Wheels, congregate meals, and WIC. States and agencies should be aware that this funding may reach the Community Action networks.

Can organizational standards requirements for local agencies be adjusted?

The role of states in the implementation of Organizational Standards is outlined in [IM 138](#). The IM describes the states authority and discretion to determine how the standards are implemented and what "meets" an organizational standard.

Can the requirements for a Community Needs Assessment be adjusted?

Criteria for what constitutes a comprehensive community needs assessment vary by state - the state has authority to revise requirements (outside of those required in Organizational Standards) as appropriate.

States should review their processes and procedures on community needs assessments and revise where appropriate.

Can state policies around board vacancies be adjusted?

States may need to allow for longer board vacancies due to virus impacts. Refer to your state policy for extenuating circumstances/extensions.

Can local agencies spend more than 20% of their allocations on administrative funds?

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 for local agencies need to be raised to allow agencies to cover PTO, costs associated with maintaining clean and safe facilities, and other virus-related administrative costs.

I have a tight deadline to submit my FY18 CSBG Annual Report review memo to OCS and I have agencies closing, what should I do?

Reach out to your OCS Program Specialist and explain the situation. Also, reach out to [Katy](#) or [Muska](#) who can help with the review or aid in identifying the most critical items that need a response. States can also elect to inform OCS that their FY18 data is final, as is.

I am supposed to hold a public hearing on my state plan, and how do I handle this when public gatherings have been canceled?

States may elect to hold a virtual public hearing by setting up an internet meeting platform. Refer to your state's requirements for holding public virtual meetings. OCS is expected to provide further guidance on this topic.

What suggestions do you have to help me or my staff who are working from home?

Here are [a few tips](#) that NASCSP remote staff have found helpful.

Are CSBG Eligible Entities considered "essential services" that can continue to operate in a shelter-in-place or essential businesses only order?

You should refer to your state's specific order for information, however, all orders to date have identified human service agencies or programs working with people with low incomes as exempt or essential services.

Can states adjust the requirement for agencies to obtain approval prior to moving funds in its budget to respond to COVID-19?

State requirements may be amended as appropriate to allow agencies to respond quickly to the emerging needs of COVID-19, including allowing agencies to move funds within their budget. States are encouraged to work with their networks to adjust these requirements as necessary.

Who should I contact if I have more questions?

Please email any other concerns you may have to NASCSP's State Assistance Director, Maribeth Schneber-Rhemrev at mschneber-rhemrev@nascsp.org. Please also reach out to your OCS Program Specialist and copy CSBGStates@acf.hhs.gov. If you are not sure who your assigned Program Specialist is, click [here](#).