



Colorado Community Services Block Grant Program Informational Memorandum

Reference: COCSBG - IM - 2020-2 - FY2020 200% FPL

Date: 4/10/2020

To: Colorado CSBG Eligible Entities

Subject: CSBG FY2020 Income Qualification Guidelines at 200% Federal Poverty Line

Summary

The Coronavirus Aid, Relief, and Economic Security Act (CARES Act), which covers both FY2020 regular CSBG and CARES Act CSBG funding, provides "That for services furnished under such Act during fiscal years 2020 and 2021, States may apply the last sentence of section 673(2) of such Act by substituting "200 percent" for "125 percent"". In response to the COVID-19 emergency, the Colorado Department of Local Affairs (DOLA) is electing to substitute the current 125% FPL requirement in the Colorado CSBG Program Manual with the newly allowed 200% FPL for FY2020 CSBG Funds (regular and CARES Act).

In addition, for the duration of the emergency, emergency cash assistance and economic stimulus payments are no longer required to be counted as income when evaluating client eligibility. Additional information about the updated policy is below.

Client Eligibility

To be eligible for CSBG services or benefits, clients must be at or below 200% of the federal poverty line as determined by the federal Office of Management and Budget (OMB) based on the most recent federal Census data and as revised annually (or more frequently) by the U.S. Department of Health and Human Services (see table below). The federal CSBG law does not require any particular process for determining client income eligibility; nor do HHS regulations. However, in order to ensure that CSBG funds are being used for income eligible clients, eligible entities should screen for income eligibility. Local CSBG programs are expected to maintain files on clients served by the CSBG program for DOLA to confirm client eligibility and review use of funds in monitoring visits or upon request.

2020 Poverty Guidelines for the 48 Continental United States

Number of Persons in Family/Household	100% Federal Poverty Level	200% of Federal Poverty Level
1	\$12,760	\$25,520
2	\$17,240	\$34,480
3	\$21,720	\$43,440
4	\$26,200	\$52,400
5	\$30,680	\$61,360
6	\$35,160	\$70,320
7	\$39,640	\$79,280
8	\$44,120	\$88,240
	For families/households with more than 8 persons add \$4,480	For families/households with more than 8 persons add \$8,960





Household Income

The policy listed in the CSBG Program Implementation Manual states *that household income includes gross (pre-tax) income from employment, net income if self-employed, public assistance cash benefits, alimony, child support, net rental income, gaming or lottery winnings, SSDI, interest, and taxable income. It is calculated without consideration of taxes paid or anticipated.* Per IRS Publication 525 “Taxable and Nontaxable Income”, emergency disaster relief cash assistance to individuals/families is not considered taxable income (see IRS Publication 525 - Disaster Relief Payments - https://www.irs.gov/publications/p525#en_US_2019_publink1000229482). In response to the COVID-19 emergency and for the duration of it, DOLA is electing to remove the requirement of including public assistance cash benefits, emergency cash assistance, or economic stimulus funds in the household’s income calculation. This policy aligns with the Federal government’s policies in emergency disasters.

Thus, for the duration of the emergency, household income does not include emergency disaster cash assistance; capital gains; any assets drawn down as withdrawals from a bank, the sale of property, a house or a car, or tax refunds, gifts, loans, lump sum inheritances, one-time insurance payments, or compensation for injury. Also excluded are non-cash benefits, such as the employer-paid or union-paid portion of health insurance or other employee fringe benefits; food or housing received in lieu of wages; the value of food and fuel produced and consumed on farms; the imputed value of rent from owner-occupied non-farm or farm housing; and such Federal non-cash benefit programs as Medicare, Medicaid, food stamps, school lunches, and housing assistance, and certain disability payments made to disabled children of Vietnam veterans as prescribed by the Secretary of Veterans Affairs.

