



NATIONAL ASSOCIATION FOR STATE COMMUNITY SERVICES PROGRAMS

COVID-19 Next Steps

April 2, 2020

AGENDA



OCS Guidance



Legislative Update



CARES Act



Discussion- What do you
need from NASCSP?

OCS Guidance

- The Office of Community Services (OCS) released a [Dear Colleague Letter 2020-16](#) and [IM 2020-ACF-OA-2020-1 ACF COVID Flexibilities](#).
- This IM and DCL detail flexibilities granted by ACF in conducting human service activities related to or affected by COVID-19.
- This DCL & IM give state grantees the authority to grant the flexibilities detailed to their local agencies.
- ***“Entities that are affected will be asked to provide documentation to the respective ACF Program Office describing the effects, including how long their program and ACF-related work or instruction were and/or will be affected.”***

Key Flexibilities Granted



Allowability of Salaries & Leave



Allowability of Costs not Normally Chargeable to Awards



Prior Approval Requirement Waivers



Extension of Financial, Performance, and Other Reporting



Extension of Single Audit Submission



SAM Registration



Application Deadlines



OCS Guidance

- **Remember, guidance from OCS will likely not be black & white due to lack of federal authority in state block grant administration**
- OCS will be releasing CSBG-specific guidance to the network. We expect that guidance to include information on CSBG administrative requirements such as monitoring and CSBG State Plan requirements.
 - No timeline for this guidance has been shared.



OCS Guidance

- **OCS is encouraging states to develop flexible policies to limit administrative burden on agencies to enable them to respond to the COVID-19 Crisis**
 - Funds may need to be reprogrammed rapidly to respond to the crisis while awaiting Supplemental awards; states should consider implementing policies that allow for this rapid reprogramming
 - Eligibility guidelines may be amended, per IM 154, to allow for flexibility in determining eligibility
 - States cannot increase the poverty threshold for regular CSBG services beyond 125% FPL
 - Ensure funds are flowing and available to the local level

Legislative Updates

Three Coronavirus related packages have become law:

1. H.R.6074 Coronavirus Preparedness & Response Supplemental Appropriations (March 6th)

- Supplemental appropriations to HHS, the State Department, and the Small Business Administration (SBA) to respond to the coronavirus outbreak.

2. H.R. 6201-Families First Coronavirus Response Act (March 18th)

- Free coronavirus testing shores up unemployment insurance, and strengthens food security initiatives.
 - \$500 million to WIC, \$400 million to TEFAP, and \$250 million to the Senior Nutrition Program.
- New emergency sick leave, as well as an expansion of the existing Paid Family and Medical Leave Act (FMLA).

Legislative Updates

3. H.R. 748 - CARES Act (March 27th)

- \$1200 direct cash assistance to many Americans
- Enhanced unemployment insurance
- Supplemental appropriations:
 - \$900 million LIHEAP
 - \$1 Billion CSBG
 - \$750 million Head Start
 - \$5 billion community development block grants

Legislative Updates

FY 2021 Regular appropriations process continues despite COVID

- NASCSP and other partners asking for \$775 million for CSBG in FY2021
 - 2 year budget agreement, not a lot of new funding available
 - Reminder: FY 2020 level was \$740 million
 - House and Senate letters in support of \$775 million being circulated by NCAF, receiving signatures
 - NASCSP submitted written testimony to House, Senate in May

CSBG Reauthorization Bill Status

- No hearings or movement at this time in the House, 158 cosponsors
- No corresponding Senate bill

CSBG Cares Act Supplemental

(1) \$1,000,000,000 for carrying out activities under **sections 674 through 679 of the Community Services Block Grant Act**, including for federal administrative expenses, and of which no part shall be subject to section 674(b)(3) of such Act: *Provided*, That to the extent Community Services Block Grant funds are **distributed as grant funds by a State to an eligible entity as provided under such Act**, and have not been expended by such entity, they shall remain with such entity for **carryover into the next two fiscal years for expenditure** by such entity consistent with program purpose: *Provided further*, 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”**;

CSBG CARES Act Supplemental

- In a Supplemental, the regular federal rules apply unless otherwise specified.
 - For the CSBG Supplemental, all CSBG requirements are intact, except:
 - Secretary authority to withhold and direct funds for specific purposes; and
 - The CARES Act can serve individuals up to 200% FPL; and
 - Funds can be carried forward and expended for an additional year.
 - All CARES Act funds must be obligated by agencies by September 30, 2022

CSBG CARES Act Supplemental- What This Means

- **States should prepare to administer the CSBG Supplemental quickly, as funds are coming within a few weeks.**
- OCS will distribute funds utilizing the normal allocation formula
- States must distribute funds utilizing their existing allocation formula
 - States must pass through 90% of funds to local entities
 - States can utilize up to 10% for discretionary projects
 - States can utilize up to 5% or \$55k for state administration

CSBG CARES Act Supplemental- What This Means

- States should be prepared to modify it's processes to allow for all requirements of the CSBG Act on a quick turn around, including:
 - An abbreviated state plan
 - Collecting some form of plan from local entities
 - Identifying requirements for Needs Assessments
 - Invoicing, Advances, Reimbursement Processes
 - Supplemental funds must be tracked separately.

CSBG CARES Act Supplemental- Prepare Now!

- Notify leadership that the award is coming
- Get contracts in place
- If legislature approval is required, notify your legislative staff to get approval on the docket immediately
- Work with your state associations, agencies, and network to develop plans, guidance, and TTA as needed
 - Consider reviewing ARRA processes, policies, lessons learned
- Balance need for expediency with accountability
- Think Broadly

CSBG CARES Act Supplemental- Upcoming Guidance

- OCS is working through the plan for administration and will release details on:
 - Timing
 - Allocation Release
 - Quarterly vs lump sum
 - Plan requirements
 - Reporting Requirements



Tools and Resources



ABOUT

Coronavirus Resources



Statement From NASCSP 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. NASCSP 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. NASCSP 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. NASCSP 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.

THE CSBG Program in 2017



Employment

6.5 million participants gained employment or work supports.

The number of individuals experiencing greater income from employment **increased by 15%** from FFY 2016.



Housing

180,515 low-income people obtained safe and affordable housing.

128,339 existing housing units improved or preserved through construction, weatherization, or rehabilitation, and **18,509** safe and affordable housing units were created.



Health

425,445 low-income people obtained health care services for themselves or a family member.

2.6 million low-income people obtained food assistance.

Community



41 million volunteer hours donated to CAAs, valued over \$1 billion of volunteers' time.

Over 300 thousand low-income individuals were mobilized toward community empowerment through participating in decision-making and policy setting, business and home ownership, or other community involvement.

Education



14,229 educational and training placement opportunities for low-income people created, expanded, or saved from elimination.

12,108 low-income people completed Adult Basic Education (ABE) or General Educational Development (GED) coursework.



Source: CSBG FFY 2017 Annual Report



CSBG and HOUSING



As a result of CSBG housing services & initiatives in FFY 2017...

180,515

low-income people obtained safe and affordable housing.



128,339

housing units were preserved or improved through construction, weatherization, or rehabilitation.



18,509

safe and affordable housing units created in communities.



13% of CSBG participants were homeless or reported living with friends and family for an extended period, according to housing data collected from 4.4 million CSBG participants.

\$54.4 million

in FFY 2017 CSBG funds were spent on CSBG-coordinated housing services and initiatives.

Source: CSBG FFY 2017 Annual Report



CSBG & COVID 19

COVID 19 has impacted daily life for all Americans. Community Action Agencies, supported by CSBG, are on the front lines providing stability to Americans who have lost their jobs, are low-income, or are vulnerable during this crisis.

In 2017...

15.3 MILLION

low-income people served, 82% of whom are living below 125% of poverty.



9.1 MILLION

individuals provided with essential emergency assistance such as food and housing.



4.3 MILLION

participants with low-incomes obtained supports like childcare, healthcare, & transportation which increased family stability.



\$7.80 LEVERAGED

from state, local, and private sources for every \$1 of CSBG funding.



PARTNERSHIPS



CAAs partner with over 200,000 other organizations nationwide to maximize the impact of their work.

COMMUNITY SERVICES BLOCK GRANT SUPPLEMENTAL FUNDING

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ABOUT CSBG

The Community Services Block Grant (CSBG) provides critical funding to combat the causes and conditions of poverty in every state and 99% of America's counties. This highly flexible and critical funding supports CSBG Eligible Entities (also known as Community Action Agencies) who are on the front lines of responding to America's COVID-19 pandemic.

CSBG FUNDS

CSBG Eligible Entities in your state use CSBG on critical poverty-fighting activities and to serve as conveners and leaders in community initiatives to address the root causes of poverty.

Community Action Agencies

- Hubs for diverse programs & services
- Tailored to local community needs
- Brought together under CSBG



- ✓ Early Childhood Education
- ✓ Energy Assistance
- ✓ Financial Literacy
- ✓ Job Training

- ✓ Transitional Housing
- ✓ Health Services
- ✓ Legal Services
- ✓ Disaster Relief

CSBG COVID-19 SUPPLEMENTAL ALLOCATION

The CSBG Network received a \$1 billion supplemental appropriation in the CARES Act to enhance poverty-fighting efforts at this critical time. These funds will help your state respond to the economic impacts of the COVID-19 pandemic on people with low incomes.

Per the CSBG Act, states are required to pass through 90% of their allocation to local CSBG Eligible Entities. States may retain up to 5% of their award for state administration costs and may use any remaining funds for discretionary projects that align with the purposes of CSBG.

Typically CSBG can serve individuals whose incomes are up to 125% of the federal poverty line. With the CSBG Supplemental Appropriation, agencies can serve individuals up to 200% of the federal poverty line.

CSBG Supplemental funds are available for expenditure through September 30, 2022.

 **NASCS**
NATIONAL ASSOCIATION FOR STATE COMMUNITY SERVICES PROGRAMS

Coming Soon:
CSBG
Supplemental
Quick Info



Joint State Office & State Association Webinar: The CARES Act & COVID Relief

Wednesday, April 8, 2020 | 3 - 4 p.m. ET

[REGISTER HERE](#)

Dear CSBG & WAP State Offices and State Associations,

Join NASCSP, the National Community Action Partnership, and CAPLAW for a joint discussion with state CSBG & WAP offices and state associations about the CARES Act and COVID-19 relief efforts. Effective deployment of the \$1 billion in supplemental CSBG funding will require coordination and collaboration between state offices and associations. We will also discuss the impact that other funding may have on the network including LIHEAP, Head Start, HUD, and nutrition programs to name a few that have been appropriated through the CARES Act and the previous relief package. The National Partners are committed to helping the network prepare for this endeavor.

Best,

NASCSP



**HOW CAN
WE HELP
YOU?**

Discussion

How can we help?