



Kansas Housing Resources Corporation policies applicable to the nationwide COVID-19 state of emergency declared by the President:

STATE OF EMERGENCY Per IM#154:

“ELIGIBILITY DETERMINATION Section 673(2) of the CSBG Act specifies that the Federal Poverty Line shall be used as a criterion of eligibility in CSBG and that the state may revise the poverty line to not exceed 125 percent of the official poverty line. While no federal waiver exists for this requirement, states have substantial discretion in defining the procedures for determining if an individual or family meets the requirements, including the timeframes for review and necessary documentation appropriate to the services or strategies being implemented. In a disaster, states may consider circumstances where individuals may have been made low-income by the disaster, including disaster-related unemployment, and may establish appropriate procedures based on individual and family needs. States are encouraged to review existing procedures and establish emergency procedures if appropriate to streamline the eligibility determination process following a disaster. If a displaced individual or family does not have the eligibility documentation in-hand, emergency procedures may include flexibility in accepting signed statements from the family attesting to necessary eligibility information pending availability of necessary documents to meet immediate emergency needs.”

With passage of the CARES Act legislation, the income eligibility threshold for CSBG funding has been raised to 200% of the Federal Poverty Level, effective February 1, 2020 and ending December 30, 2022. All CSBG funds expended during this timeframe fall under this 200% FPL eligibility guideline.

A state of emergency has been declared for the state of Kansas (and the nation) and it is no longer possible or practical to obtain income documentation from individuals and/or households needing assistance. Furthermore, disaster/crisis-related unemployment may create circumstances where many individuals or families that may not have been eligible for assistance prior to the disaster/crisis may now be eligible. Subrecipients are encouraged to use the following three possible approaches:

1. "Presumptive eligibility" determinations based on unemployment.
2. The use of short, signed declarations or affidavits of eligibility.
 - a) Self-declaration must be written and include date, signature, and indication that the client/household meets the required 200% FPL cut-off for CSBG services.
3. Accepting eligibility certification paperwork from another Federal or State program.

Eligible services include, but are not limited to:

Emergency Services; Food Assistance; Medical Services (screenings, immunizations, medication/prescription, medical supplies); Transportation to Medical Services; Fuel; Clothing; Emergency and Permanent Housing Deposit; Rent/Mortgage Assistance; Utility Assistance; LIHEAP Utility Assistance; Utility Reconnection Costs; and Fees Required to Assure Resumption of Services.

It is KHRC's position that the one-time stimulus payment received by many individuals and households as a result of the CARES Act not be counted towards income eligibility criteria.

Flexibility should be considered in program operation functional areas, especially in the Client Intake Process. Finding creative ways to reach out and serve low-income Kansans is encouraged and supported.

The following application modes are considered doable and notable practices as alternatives to the face-to-face interview:

1. Mail-in application;
2. Telephone intake; and
3. Online application (if the local agencies have the capability or have an online intake system).

♣ NOTE: Enhancements to the agency's current system that enables online or electronic applications is an allowable budget expenditure through the CSBG program and is especially justifiable during this environment, for the health and safety of both staff and customers. Please reach out to your software provider for more details if you are interested.

Program Options and Hours of Program Operations: CAAs may add or reduce hours or days of program operations without obtaining prior approval if the changes can be justified. Please notify your program manager via telephone or email of any changes in program operational hours.

Tripartite Board Business and Communications: Due to the varied nature of Grantee and Tripartite Board structure; i.e. county governments, association of governments, private non-profit entities, etc., subrecipients should seek their own legal counsel as to the requirements of conducting board business via telecommunications. For public agencies that fall under the guidelines of the Kansas Open Meetings Law, please refer to this link <https://ag.ks.gov/open-government> for guidance on how to conduct official business during the state of emergency. For private agencies and Tripartite Boards, please refer to your board bylaws to determine meeting requirements, and the use of telecommunications for such.

Public hearings occurring for the purpose of the 2021 State Plan may be conducted via telecommunication systems. Use of a video conferencing platform (Zoom, Skype, and Google Hangouts) in order to conduct the hearing is allowable, given that ample notice of the meeting and coordinating access to the appropriate communication for participants is considered.

This situation is continuing to evolve, and new developments and recommendations are being provided regularly from the Federal Office of Community Services, the Centers for Disease Control and Prevention (cdc.gov), and the Executive Office of the President. KHRC will revise this guidance as necessary to comply with requirements from those authorities listed above.



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