

## [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.

### [Federal Guidance](#)

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

**On March 31, 2020**, OCS released [Dear Colleague Letter 2020-16](#) and [IM 2020-ACF-OA-2020-1 ACF COVID Flexibilities](#) detailing flexibilities granted by ACF in conducting human service activities related to or affected by COVID-19.

**On April 13, 2020**, the Office of Community Services (OCS) released [CSBG IM 2020-157 Immediate Guidance on COVID-19 Response](#). This IM provides clarification on several key issues, including:

- CSBG grantees may continue to charge salaries and benefits to currently active CSBG awards consistent with the recipients' policy of paying salaries (under unexpected or extraordinary circumstances) from all funding sources (both federal and non-federal);
- Encourages State CSBG Lead Agencies to expedite reprogramming of existing CSBG funds and the release of both regular CSBG and CARES Act funding where possible;
- Encourages State CSBG Lead Agencies to reduce short-term administrative burden for themselves and eligible entities to ensure attention is focused on responding to immediate community needs; and
- Affirms that the federal poverty line amendment to 200% for eligibility determination applies to both regular CSBG funds as well as CARES Act funds for services provided in FFY 2020 and 2021.

**On May 8, 2020**, the Office of Community Services (OCS) released [CSBG IM 158 CARES Act Supplemental Administrative Guidance](#). This IM provides clarification on several key issues, including:

- Projected allocations to states based on the standard formula for distribution under Sections 675A and Section 675B of the CSBG Act (42 U.S.C. 9905 & 9906). States, territories, tribes, the Commonwealth of Puerto Rico and the District of Columbia that applied for, and received, funding in FY2020 will receive a portion of the CSBG CARES Act funds.

- OCS is temporarily withholding \$43.5 million from the release to confirm Congressional intent regarding Sections 675B(b)(1) and 675B(b)(3) of the CSBG Act that address allocation amounts for states that are subject to minimum and maximum allotments.
- States will be required to submit a CSBG State Plan amendment with information specific to CARES Act funding. This information will be submitted online via the Online Data Collection (OLDC) system, and states should expect to receive additional instruction via Action Transmittals. The format for the submission will be similar to the regular CSBG State Plan, but the amount of information required will be substantially reduced, to include: amounts allocated to each eligible entity, income eligibility levels, a plan for state training and technical assistance and discretionary uses of CARES CSBG, and a detailed monitoring plan.
- States are urged to begin immediate distribution of resources to eligible entities in order to ensure that critically needed resources are available to meet community needs.

**On July 8, 2020**, OCS released [CSBG DCL-2020-21](#). This DCL provides further guidance to states on critical issues, including:

- Details on the CSBG State Plan amendments for CARES Act Funds, due September 1st, 2020.
- A full public hearing is not required for CARES Act amendments; however, the plan must be made available for public inspection via posting the plan publicly (i.e., on the state website) for a reasonable timeframe. States should notify eligible entities and other known stakeholders of the availability of the plan for public review and comment.
- Direction that decisions on how agencies utilize their 90% allocation should be made at the local level and should not be directed by the state.
- Directs states to incorporate CSBG CARES Act funding into monitoring plans.
- Details that costs related to the public health needs and economic impacts of COVID-19 are allowable.
- Affirmation of the need to reduce short-term administrative burden, including allowing expedited amendments to Community Action Plans, and brief reporting requirements.

**On July 15, 2020**, OCS released [CSBG-AT-2020-05 Application for CARES Act Funds for States and Territories](#). This Action Transmittal details the [Community Services Block Grant CARES Act Supplemental State Plan](#) amendment submission requirements. The content is similar to that of the

regular CSBG State plan. This plan amendment must be submitted by September 1, 2020 via the On-Line Data Collection System (OLDC).

### **CSBG CARES Act Supplemental**

#### **Am I required to allocate the entire CARES Act 90% funds to agencies within 30 days of receipt of funding?**

States must allocate 90% of their CSBG allocation from OCS to eligible entities consistent with their current funding formula. The funds should be available to agencies for expenditure within 30 days of receipt of funds, as is consistent with [State Accountability Measure 2Sa](#). States should utilize their normal distribution formula for this process. **This does not mean that states must advance the entire allocation to agencies within 30 days.** At a minimum, states should have funds allocated to local agencies or obligated within contracts within 30 days of receipt of funds. States who provide advances should work to make advances available as soon as contracts are executed.

[§ 200.305 of Uniform Guidance](#) details requirements around advances. Although this section of the Uniform Guidance does not apply to CSBG, some states incorporate Uniform Guidance into contracts and requirements. States should minimize advance payments to the minimum amounts needed and be timed to match the immediate cash needs of agencies. Thus, states should **not** issue a single lump-sum advance to remain in compliance with Uniform Guidance.

#### **Does the 200% FPL guideline only apply to CARES funding?**

Per [CSBG IM 157](#), the 200% FPL guideline can be applied to both regular and CSBG CARES Act Supplemental funding. Per the CARES Act, this applies to services furnished in FFY 2020 and 2021, regardless of when those funds were allocated for CSBG services.

#### **Can state offices direct how agencies can utilize CARES supplemental CSBG funding?**

State offices are required to allocate 90% of the CARES supplemental CSBG funding to CSBG eligible entities. As with regular CSBG, 90% funds should be allocated based on local needs as determined by the local agencies. As such, states cannot direct how agencies allocate and utilize their 90% funds.

**When must agencies and states expend CARES funding by?**

CSBG CARES Act funding is available for obligation through September 30, 2022. Eligible entities can carry forward CARES funding for two years instead of the normal one allowed by the CSBG Act.

All CARES Act funds must be liquidated by December 29, 2022.

**What are the effective dates for the CSBG CARES award?**

CARES Award budget and project periods begin March 27, 2020 and end September 30, 2022. Pre-award cost may be charged back to January 20, 2020.

**What things should states consider when approving pre-award costs charged to the CARES Act Supplemental?**

Pre-award costs are defined in § 200.458 of Uniform Guidance as “those incurred prior to the effective date of the Federal award directly pursuant to the negotiation and in anticipation of the Federal award where such costs are necessary for efficient and timely performance of the scope of work. Such costs are allowable only to the extent that they would have been allowable if incurred after the date of the Federal award and only with the written approval of the Federal awarding agency.”

Agencies should consider if costs incurred from January 20, 2020 through the effective date of the award would be allowable, and if the costs were necessary for the performance of the award. Supplies such as personal protective equipment necessary to provide services to the community; planning activities such as community meetings with partners to develop a coordinated community response plan; or technology purchases such as laptops necessary for remote work could all be examples of pre-award costs.

**[CSBG State Administration](#)****When will OLDC open for submission of the CSBG CARES Act Supplemental State Plan?**

The On-Line Data Collection system (OLDC) will open Friday, August 21, 2020, for submission of the CSBG CARES Act Supplemental State Plan.

**Do I have to submit a State Plan this year for regular CSBG funds?**

Please refer to [CSBG-AT-2020-06, CSBG CARES Act and CSBG FY2021 Plan Due Dates](#) for details regarding whether your state will be required to submit a CSBG State Plan, and the attendant deadlines for such.

### **How should I handle increasing the FPL to 200% in my state?**

States should review their state regulations, policies, and contracts to identify those places that include references to the FPL. If the state's regulation includes 125% FPL, consult your legal counsel, leadership, and NASCSP for options on how to proceed. If the FPL is in a policy or contracts, the state can address the increase via simple amendments.

### **Can the state adjust other CSBG eligibility requirements aside from the 200% FPL?**

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. [CSBG IM #157](#) also encourages states to consider streamlining eligibility requirements.

### **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. [CSBG IM #157](#) also encourages states and local entities to reprogram existing funds to address the needs in response to COVID-19 as appropriate.

### **Can local agencies spend more than 20% of their allocations on administrative costs?**

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.

### **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 state's 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.

**I am supposed to hold a public hearing on my state plan; 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.

**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.

**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.

**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](mailto:mschneber-rhemrev@nascsp.org), or Hugh Poole, NASCSP's State Assistance Specialist, at [hpoole@nascsp.org](mailto:hpoole@nascsp.org). Please also reach out to your OCS Program Specialist and copy [CSBGStates@acf.hhs.gov](mailto:CSBGStates@acf.hhs.gov). If you are not sure who your assigned Program Specialist is, click [here](#).