



NATIONAL ASSOCIATION FOR STATE COMMUNITY SERVICES PROGRAMS

Member Only Conversation on CSBG DCL-2020-21

July 14, 2020



AGENDA

- **Review of DCL-2020-21**
- **Outstanding Questions**
- **COVID-19 Response Group Survey**
- **Review DCL-2020-20**
- **Member Discussion**



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Community Services Block Grant

Dear Colleague Letter

DCL#: CSBG-DCL-2020-21
DATE: July 10, 2020
TO: State CSBG Lead Agencies and CSBG Eligible Entities
SUBJECT: Roles of State CSBG Lead Agencies and CSBG Eligible Entities in Planning and Implementing CSBG CARES Act Grants
ATTACHMENT(S): N/A

CSBG DCL-2020-21 State Lead Agencies and Eligible Entities CARES Act Roles

Dear Colleagues,

The Office of Community Services (OCS) has received a number of questions from State Community Services Block Grant (CSBG) Lead Agencies and from CSBG eligible entities regarding state direction in the implementation of supplemental funds distributed under the Coronavirus Aid, Relief, and Economic Security Act, P.L. 116-36 (CARES Act). Many of these questions have been focused on what information is required prior to issuance of state contracts, whether a full community needs assessment is required prior to award of supplemental CSBG CARES Act funds, and whether states can prescribe or limit the types of CARES Act services provided by eligible entities.

To help address these questions, this letter discusses the role of states in (1) ensuring flexibility to meet urgent community needs, (2) creating procedures to amend plans and address new needs, (3) supporting locally identified services and strategies, (4) facilitating communication, performance management, and technical assistance, and (5) monitoring and accountability.

Ensuring Flexibility to Meet Urgent Community Needs

As outlined in [CSBG Information Memorandum 157](#) (IM-157), community needs resulting from COVID-19 are rapidly evolving and may differ from community to community. In IM-157, OCS encourages State CSBG Lead Agencies to place a priority on the efficient and ongoing release of necessary CSBG funding to support community-based services by eligible entities.

Ensuring Flexibility to Meet Urgent Community Needs

Encourages states:

- To expedite the release of CARES Act funds “where possible and appropriate”
- Reduce short-term administrative burden
 - Expedite amendments to CAP Plans
 - “Blanket allowances to use CSBG resources for certain new purposes consistent with the CSBG Act”
 - Instate brief reporting requirements requesting only the most essential information on an immediate basis
- Maintain best possible records of expenditures and services

Identifies select eligible costs:

- Expenses related to public health needs (PPE, sanitation)
- Services & Strategies for responding to needs created by the economic impact of COVID-19

Creating Procedures to Amend Plans and Address New Needs

A state plan amendment is due by September 1, 2020

An Action Transmittal will be released the week of July 13, 2020 to provide further guidance on this amendment

A full public hearing is NOT required, however the state must:

- make the plan available publicly (e.g., on the state's public website)
- for a “reasonable timeframe” (usually defined as not less than 30 days)
- Notify eligible entities and other stakeholders (including Associations)

If the state is not changing its allocation formula from the original state plan, the state can allocate 90% funds to entities prior to public inspection

Supporting Locally Identified Services and Strategies

“The determination of services and strategies to be implemented within each community must be made by eligible entities, consistent with the standard CSBG framework.”

- States may release funds to entities to meet emergency needs, while updating needs assessments at a later date.

States should coordinate with eligible entities to provide services consistent with state emergency management and public health requirements to prevent disease transmission.

State Technical Assistance, Coordination, and Performance Management

“States may not direct that eligible entities use their share of CSBG CARES Act funds for specific services and strategies.”

- Decisions on how to utilize 90% funds are local decisions

States may direct the use of remainder dollars (CSBG funds available after allocating 90% to agencies and state administrative costs not exceeding 5%) consistent with the CSBG Act.

Monitoring & Accountability



States must incorporate CARES Act funding into monitoring plans

- Monitoring may occur during implementation to prevent later findings or disallowances

Outstanding Questions

- “Onsite” Monitoring
 - States are moving forward with requiring monitoring virtually
- 200% FPL if submitting a two year state plan
- Specifics of the State Plan amendment
- CSBG CARES Act Reporting requirements



COVID-19 Response Group (CRG) State Survey

The COVID-19 Response Group (CRG) is working to tell the Community Action story in response to COVID-19.

To inform the story, we are collecting information from states and local CSBG entities via surveys sent out last week.

- **These surveys are voluntary.**

State responses to the survey will be posted on the membership portal to support peer-learning.

Responses to both surveys are due by July 22, 2020.

Link: <https://www.surveymonkey.com/r/K6WDFR7>

CSBG DCL-2020-20

Provides an explanation of the minimum funding/maximum allotment provisions that have impacted CARES allocations for twelve states.

Details that OCS is withholding the allotments in excess of 140% of the prior year awards for those twelve states (Alaska, Delaware, Hawaii, Idaho, Montana, Nevada, New Hampshire, North Dakota, South Dakota, Utah, Vermont, and Wyoming) who typically receive a minimum funding allocation until Congressional action clarifies that this clause of the CSBG Act does not apply to CARES Act funds.

No timeline is given for resolution, but NASCSP will continue to advocate on behalf of our state members to see that all states receive this critical funding as quickly as possible

Let's Talk About It...

