

CSBG Guidance Bulletin

CSBG Assistance and COVID-19

With the advance of COVID-19 and with emergency declarations being made across all levels of government, the work we do in service to low income and at-risk populations is even more critical than ever. As a part of the response to the emergency and to meet the needs of low-income Montanans, DPHHS is implementing the approaches listed below.

1. The spread of COVID-19 in Montana could impact routines and daily operations. DPHHS will rely on the judgement of each Agencies' governing bodies and program administrators to determine the most expeditious steps necessary to ensure continuity of services. Flexibility should be considered.
2. Agencies should consider creating or updating their infectious disease outbreak response plan to include:
 - a. Identifying work-related exposure and health risks to employees.
 - b. Reviewing human resources policies to ensure the policies and practices are consistent with public health recommendations.
 - c. Exploring policies and practices for flexible worksites or hours to increase physical distance between employees.
 - d. Identifying essential business functions to maintain operations if interruptions to supply chains or increased absenteeism occur.
 - e. Practicing the necessary measures intended to limit the spread of the virus.
3. CARES Act funds must be utilized to prevent, prepare for, and respond to the coronavirus in a manner allowed under the CSBG Act. These funds may carry over into next two fiscal years ending through Sept. 30, 2022 and must be tracked separately from regular CSBG funds. Costs incurred starting Feb. 1, 2020 are allowable.
4. Agencies will be required to submit a Supplemental Community Action Plan as a separate work plan or as an addendum to your current work plan and a Limited Scope Needs Assessment as an addendum to your current Needs Assessment. A separate guidance document will be issued.
5. The Administration for Children and Families (ACF) in IM-ACF-OA-2020-01 and the Office of Community Services in IM #154, have provided specific guidance around the flexibilities that are available during an emergency response. OCS places a high priority on helping CSBG-funded agencies to meet the immediate needs of low-income households, including those that may have lost their income due to an event. The memorandum also specifies that CSBG Eligible Entities may modify their community action plans where necessary to free resources for assistance. **Please document the use of any flexibility.** Our federal partners may ask for documentation in the future.
6. Administration expenses should not exceed the performance goal of 20%. DPHHS understands that agencies may need to exceed this limit due to COVID related needs. Agencies expecting to exceed the 20% performance goal for administrative expenses should notify DPHHS and include a justification for the need.
7. Payment of Salaries and Wages and Fringe Benefits: Agencies should follow their existing policies concerning the payment of salaries, wages, and fringe benefits, including leave. Federal grant funds may be used to pay for different types of leave (e.g. sick, emergency closures, etc.) so long as organizations follow criteria for a leave policy as set forth in Uniform Guidance (2 CFR 200).
 - a. The Uniform Guidance specifically states that the cost of leave may be charged to federal grants if:

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- i. The leave is provided under the established written leave policies;
 - ii. The costs are equitably allocated to all related activities; and
 - iii. The organization uses a consistent accounting basis for costing each type of leave
 - b. The costs must also meet the basic considerations for cost allowability in 45 CFR § 75.402-411, requiring that all costs be necessary, reasonable, and allocable.
 - c. Agencies should adopt or amend a formal policy that provides for paying staff considering sick leave, emergency closure, or other reduction in staffing. Payment of salaries, wages, and benefits cannot be retroactively paid if a formal policy was not in place.
8. Income Eligibility Verification for Emergency Assistance
 - a. The CARES Act permits states to increase eligibility to 200% of poverty for services furnished during federal fiscal years 2020 and 2021. DPHHS has elected to adopt this expansion of eligibility and will permit serving individuals at or below 200% of the Federal Poverty Guidelines utilizing CSBG CARES funds; as well as, CSBG funds allocated in 2019 and carried forward, and CSBG funds allocated FFY2020 and FFY2021.
 - b. For the duration of the emergency, emergency cash assistance and economic stimulus payments are not required to be counted as income when evaluating client eligibility.
 - c. The federal CSBG law does not require any particular process for determining client income eligibility; nor do DPHHS regulations. However, in order to ensure that CSBG funds are being used for income eligible clients, Agencies should screen for income eligibility. Local CSBG programs are expected to maintain files on clients served by the CSBG program for DPHHS to confirm client eligibility and review use of funds in monitoring visits or upon request.
 - d. Pursuant to CSBG Information Memorandum 154, 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. DPHHS recognizes that 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. Agencies are encouraged to use the following three possible approaches:
 - i. "Presumptive eligibility" determination based on unemployment.
 - ii. The use of signed declarations or affidavits of eligibility.
 - iii. Accepting eligibility certification paperwork from another Federal or State program.
 - e. If income verification is not possible, customers that have been income verified in the past 12 months for publicly funded services and direct financial aid may receive assistance while these emergency policies are in place.
 - f. Emergency disaster relief services, which are provided to people who are likely to meet the CSBG income eligibility requirements, do not require validation of income when circumstances make it impossible or impracticable to obtain income documentation. Examples include homeless shelters and food banks; or services to children receiving SNAP benefits; and/or services that facilitate linkages and coordination of services to low-income people in the community.
9. Organizational Standards: Agencies are expected to continue to adhere to the CSBG Center of Excellence Organizational Standards and the timelines for completing Technical Assistance Plans. Please contact your DPHHS Program Staff if you encounter issues or challenges with these requirements. Certain flexibilities may be considered for the three-year Community Needs Assessment. Further Guidance will be issued.

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- 10.** Board policies: Agencies are expected to follow their organizational policies, federal regulations and state law on board governance.
 - a.** DPHHS understands that filling vacancies may be more difficult during this time. Challenges should be documented and noted during your next monitoring visit.
 - b.** Virtual meetings are allowable, so long as agencies are following guidance set forth in the Montana Nonprofit Act