

# Addendum to Community Action Agency Contractor Implementation Manual

## CSBG Coronavirus Aid, Relief, and Economic Security (CARES) Act Program Requirements EFFECTIVE September 1, 2020

**I. CONTRACTUAL REQUIREMENT** Sub grantee Recipients shall establish procedures to comply with the requirements of the Coronavirus Aid, Relief and Economic Security (CARES) Act, Public Law 116-136 (2020) and must use CSBG CARES Act funds to help prevent, prepare for or respond to the coronavirus.

### II. PROCEDURES

- A. Purpose of Funds: CARES Act Funding is part of an effort to address the public health and economic impacts of the coronavirus disease, known as COVID-19. The funding is to support a robust and flexible community response to urgent needs through community-based services. The determination of services and strategies to be implemented within each community must be consistent with the standard statutory CSBG framework outlined in the CSBG Act: based on a model of community-level needs assessment, planning, and service activities. CAAs must adapt service delivery approaches in close partnership with public health and emergency management professionals within communities.
- B. Emergency Response: Community needs resulting from COVID-19 are rapidly evolving and may differ from community to community. While the coordination of local efforts with emergency management and public health experts is critical in all emergencies, it is essential that any services and activities be conducted in a manner that is consistent with efforts to prevent disease transmission and efficiently manage the distribution of resources. CAAs that deliver CSBG services must act in accordance with local public health and safety requirements and are encouraged to establish formal channels of communication with local health and emergency management authorities while offering support to meet local needs.
- C. Community Action Plans: Community needs resulting from COVID-19 are rapidly evolving and may differ from community to community. All agencies are required to submit a Community Action Plan (CAP) that includes a section for COVID response. The CAP must include:
  - 1. Description of community assessment conducted specific to the impact of the pandemic, priority needs that have been identified, strategies and program structure to address the needs
  - 2. Description of partnerships, efforts taken and processes put in place to ensure there is no duplication of benefit
  - 3. Description of how programs and services relate to the purpose of the funds: to help, prevent, prepare, and respond to Coronavirus

CAAs are required to upload revised CAPs in OKGrants using the upload link associated with the CSBG-CR grant application upon completion of revision(s).

At all levels of the CSBG network, it is critical to work in partnership to meet the needs of individuals and families with low income, including those with disabilities, seniors, or other particularly vulnerable circumstances.

- D. Duplication of Benefits: The CARES Act requires each subgrantee to have procedures in place that prevent duplication of benefits when using CARES funds, meaning that the cost has not or will not be paid by another source. Duplication of benefits refers to a person, household, business, government, or other entity that occurs when:
- an applicant receives assistance from multiple sources intended for the same purpose *and*
  - the total amount of assistance received exceeds the total identified need
- CAAs must develop written procedures that outline steps that will be taken to prevent fraud, waste and abuse of the CARES funds and prevent duplication of benefits when using CARES funds that includes the following:
1. Program design that targets primary needs (and are unlikely to be addressed by other sources)
  2. Identify and document what other resources are available for the program
  3. Identify and document available resources and any gaps in budgets that CARES funds could fill
  4. Consider timing of funding availability from various sources
  5. Includes methods utilized to ensure prevention of duplication of benefits
  6. CAAs must have a process to check to see that subrecipients, assisted individuals or families, businesses, and other entities that receive CSBG-CR assistance have not previously received, or will not receive, duplicative assistance from another source before CSBG-CR assistance is provided. *This duplication of benefits analysis may be accomplished in various ways including by requiring these entities or beneficiaries to provide a self-certification indicating that they have not received a duplicative benefit, requiring them to fill out a questionnaire listing potentially duplicative assistance that they have already received, or reasonably anticipate receiving, and through other means.*
  7. The CAA must do this duplication of benefits analysis before providing CSBG-CR assistance and should only pay for unmet needs/needs not met by other sources of assistance.
  8. The CAA must also require that if subrecipients, assisted individuals or families, businesses, and other entities subsequently receives a duplicative benefit, it agrees to repay the CAA.

For monitoring purposes, DOB Procedures must be uploaded in OKGrants using the upload link associated with the CSBG-CR grant application by November 1, 2020.

- E. MoUs and Subcontracts Agreements: CAAs are required to have a policy in place that defines when MoUs and Subcontract Agreements are used.
- A memorandum of understanding (MoU) is a type of agreement between two or more parties that expresses a convergence of will between the parties, indicating an intended common line of action. It is often used either in cases where parties do not imply a legal commitment or in situations where the parties cannot create a legally enforceable agreement. An MOU is not a legally enforceable document.
  - A subcontract agreement is a legally binding and enforceable agreement between two or more competent parties to perform (do) or not to perform (do) a particular thing. A subcontractor is a company or person whom a CAA hires to perform a specific task as part of an overall project and pays for services provided to the project.
  - Work and services covered by the CSBG CARES contract may be subcontracted but must receive prior written approval of ODOC (contract part II; part I.C).
  - Subcontract Agreements must include the following information:
    1. Date(s) that agreement is in place
    2. Name of both companies/agencies
    3. Contact information for both companies/agencies
    4. Contract or agreement description
    5. Detailed narrative of each party's responsibilities
    6. Detailed description of services to be rendered
    7. Fees for services; if no fees are charged, the agreement should state that
    8. List compliance requirements
    9. List recordkeeping requirements
    10. List timelines/due dates for services being rendered
    11. Printed names of both company's/agency's Executive Director/CEO, signatures and dates agreement was signed.
  - At a minimum, the required supporting documentation when the partnership entity provides the service (when no intake is done by the CAA , the CAA does not verify client eligibility and/or the COVID relation and no demographics are collected) is a subcontract agreement with the partnership entity and a monthly outcome report from the partnership subcontractor (for each month expenditures are paid to the partnership subcontractor) that includes the following items:
    1. number of people/households served
    2. outcome resulting from the service
    3. certifies that the client(s) met eligibility guidelines
    4. certifies the partner verified the client(s) situation is COVID related

For monitoring purposes, Subcontract Agreements must be uploaded in OKGrants using the upload link associated with the CSBG-CR grant application by November 1, 2020.

- F. Eligibility requirements under the CARES Act can serve individuals whose income is at or below 200% of the Federal Poverty Guidelines; the federal poverty line amendment to 200% for eligibility determination applies to CSBG services provided in FFY 2020 and 2021-including regular and supplemental CSBG allocations <https://aspe.hhs.gov/poverty-guidelines>
- G. Program Policies: CAAs are required to develop program policies for services funded by CSBG CARES Act funds. Program policies must provide step-by-step guidance, and at a minimum, include:
1. Description of each available service:
    - a. Description of emergency services provision plan (qualifications, limitations, evaluations, and coordination with other programs)
      - i. Late fees or pet fees for rent and/or utility expenses are allowable but only when outlined in the lease and/or with the utility company
      - ii. Hotel/Motel expenses are allowable but verification that no shelter beds were available is required. Written policies must include procedures for purposes where hotel/motel vouchers will be used and how hotel/motel vouchers are to be distributed
    - b. Description of case management services and self-sufficiency plans
  2. Eligibility guidelines, income verification process and documentation
  3. Documentation of COVID related situation (e.g. loss of job, etc.)
  4. Frequency and duration of services
  5. Maximum dollar amount per household
  6. How payments for services will be paid to vendors on behalf of clients

For monitoring purposes, Program Policies must be uploaded in OKGrants using the upload link associated with the CSBG-CR grant application by November 1, 2020.

H. Financial Management:

1. All financial management and record keeping shall be in compliance with State (CAA Implementation Manual, Requirements 107, 108, 109, 112, 115, 116) and Federal regulations 2 C.F.R. as applicable
2. Expenditure reports: CAAs shall submit an actual Monthly Expenditure Report by the twentieth (20th) of the following month even if the expenditures are zero. For monitoring purposes, agencies are required to upload the following supporting documentation using the upload link associated with each monthly expenditure report:
  - a. Monthly summary of revenue and expenses by budgeted line item
  - b. Detailed ledger for monthly expenditures
3. Advances: CAAs may submit a Request for Funds through OKGrants as often as necessary to meet its financial obligations as long as expenditure reports are

maintained in an up-to-date manner. All funds received shall be expended within three (3) days of receipt.

4. The CARES Act states the purpose of the funds are “to prevent, prepare for, and respond to coronavirus”. All of the same types of costs that are allowable under regular CSBG are allowable under CARES funding (so long as the costs align with the purpose of CARES funding). Allowable expenses may include:
  - a. Costs related to public health needs (such as costs related to obtaining personal protective equipment for staff and sanitizing facilities)
  - b. Direct client services and strategies to address individual, family, and community-level needs created by the economic impact of COVID-19 (e.g., emergency food assistance, housing, utility assistance, employment assistance, case management and other services to help address emergency needs and promote individual, family, and community economic recovery)
  - c. Capacity Building, Community Resource Coordination and projects that will enable agencies to continue operation in a pandemic, provide services online, remote working and computer purchases
  - d. Salaries of staff assigned to work with CARES Awards
  - e. Space costs and Re-arrangement costs (re-arrangement of facilities to allow for social distancing)

I. Reporting Outcomes:

1. CAAs are required to track all CARES Act activities (services and partnerships) and the resulting outcomes separately and provide outcome reports to ODOC on a quarterly basis.
2. CAAs must utilize the CSBG-COVID service-fund category in CAPSystems to track CARES activities.
3. There is no required format for the outcome report, but the report must provide data and include narrative outcomes for all budgeted line item expenditures that were expended during each quarter’s reporting period.
4. Quarterly outcome reports must be uploaded in OKGrants using the upload link associated with the CSBG-CR grant application by the due dates in the following table:

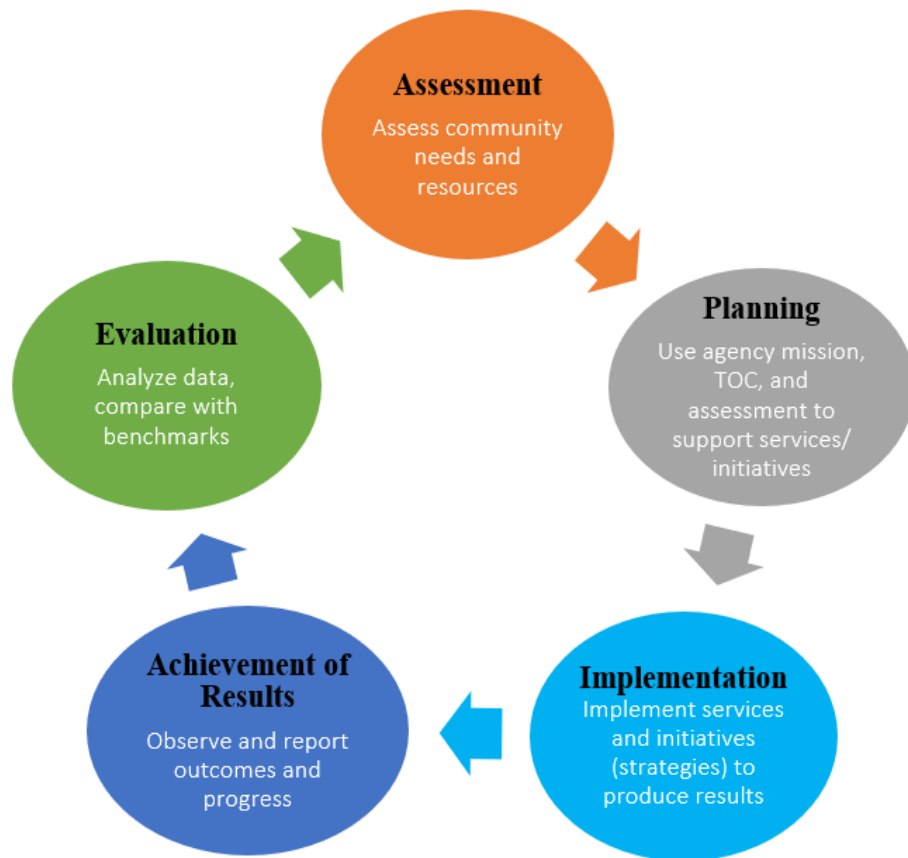
<b>Quarterly Report</b>	<b>Reporting Period</b>	<b>Upload Due Date</b>
1 <sup>st</sup> Quarter 2020	March, April, May, June 2020	July 20, 2020
2 <sup>nd</sup> Quarter 2020	July, August, September 2020	October 20, 2020
3 <sup>rd</sup> Quarter 2020	October, November, December 2020	January 20, 2021
1 <sup>st</sup> Quarter 2021	January, February, March 2021	April 20, 2021
2 <sup>nd</sup> Quarter 2021	April, May, June 2021	July 20, 2021
3 <sup>rd</sup> Quarter 2021	July, August, September 2021	October 20, 2021
4 <sup>th</sup> Quarter 2021	October, November, December 2021	January 20, 2022
1 <sup>st</sup> Quarter 2022	January, February, March 2022	April 20, 2022

2nd Quarter 2022	April, May, June 2022	July 20, 2022
3 <sup>rd</sup> Quarter 2022	July, August, September 2022	October 20, 2022
Final Outcome Report (Upload with Closeout)	March 27, 2020 through September 30, 2022	No later than November 30, 2022

J. Monitoring Plan: To ensure high quality and accountable services, monitoring and program oversight activities will occur during program implementation with the goal of identifying and preventing later findings or disallowances. Monitoring activities will occur monthly and quarterly with an onsite review conducted prior to the end of the contract period.

K. Results Oriented Management Accountability (ROMA):

1. Agencies are required to utilize the ROMA cycle with CARES Funding.
2. Because the pandemic is a constantly changing situation, community needs will be changing. Agencies are required to periodically re-assess the needs of the communities they serve (suggested a minimum of a quarterly basis and/or when significant events occur such as a local increase in COVID cases) to determine if new strategies are needed to address the highest priority needs.
3. Documentation must be maintained for each re-assessment and provided to ODOC upon request for monitoring purposes. The documentation may be informal but must reflect the agency's assessment of its service area, changing needs and new planned strategies.
4. This can be achieved through a scaled-back assessment that focuses on readily available sources:
  - Agency service data
  - Data on COVID Impacts
  - Data from 211 or other government sources
  - Additional Resources coming into the community from CARES or other COVID-related relief efforts
  - Analyze & prioritize needs through lens of agency Mission, Strategic Plan, Theory of Change



### III. Forms

None

### IV. Resources

Community Needs Assessment COVID-19 Template

[https://communityactionpartnership.com/publication\\_toolkit/covid-19-community-assessment-update-template-data-resource-guide/](https://communityactionpartnership.com/publication_toolkit/covid-19-community-assessment-update-template-data-resource-guide/)

Office of Community Services IM157

<https://www.acf.hhs.gov/ocs/resource/csbg-im-2020-157-immediate-guidance-on-covid-19-response>

Oklahoma Department of Health

<https://coronavirus.health.ok.gov/>

Oklahoma Department of Commerce

<https://www.okcommerce.gov/covid19/ours-plan/>

OSHA Guidance on Preparing Workplaces for COVID-19

<https://www.osha.gov/Publications/OSHA3990.pdf>

CDC Prevention of COVID

<https://www.coronavirus.gov/>

2CFR200

<https://www.govinfo.gov/app/details/CFR-2014-title2-vol1/CFR-2014-title2-vol1-part200/summary>

*Effective for CSBG-CR-2020*