

CSBG Coronavirus Aid, Relief, and Economic Security (CARES) Act

Frequently Asked Questions (FAQ) STATE GUIDANCE AND RESOURCES

This FAQ provides information to Community Services Block Grant (CSBG) and CSBG CARES Act (CSBG-CR) sub-grantees on using grant funds and related flexibilities provided by the CARES Act as communities work to help prevent, prepare for or respond to the Coronavirus.

For further state guidance, refer to ODOC's *CAA Implementation Manual, Addendum 2020-001*. Questions related to CSBG CARES can be submitted to Paula Jennings at 405-227-4091 or via email: Paula.Jennings@okcommerce.gov

CARES Act and CSBG General Information

Question 1:

Where do I find the CARES Act? When was it enacted?

Answer 1:

The CARES Act, PL 116-136, was signed by President Trump on March 27, 2020. It is available online at:

<https://www.congress.gov/bill/116th-congress/house-bill/748>

Question 2:

Where can I find the CSBG regulations?

Answer 2:

The regulations can be found at the following website:

https://www.acf.hhs.gov/sites/default/files/ocs/leg_title_icommunity_services_block_grant_act_10271998.pdf

Question 3:

Where can I find ODOC's requirements for the CSBG CARES funding?

Answer 3:

The state requirements can be located on ODOC website's CSBG information page:

<https://www.okcommerce.gov/community-development/community-action-agencies/community-services-block-grant-programs/>

Question 4:

Where can I find the recorded roundtable sessions and ODOC's CSBG CARES Program Requirements?

Answer 4:

The recorded round table meetings can be located on the ODOC website's CSBG information page: <https://www.okcommerce.gov/community-development/community-action-agencies/community-services-block-grant-programs/>

Question 1:

How is my agency expected to spend the CARES funds?

Answer 1:

The determination of services and strategies to be implemented within each community with the use of CSBG CARES funding 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.

Funds must be used to prevent, prepare for or respond to the coronavirus.

1. The funding is to support a flexible community response to urgent needs through community-based services.
2. The determination of services and strategies to be implemented within each community must be determined at the local level and be consistent with the standard statutory CSBG framework outlined in the CSBG Act:
 - a. based on a model of community-level needs assessment (CNA)
 - b. planning – Community Action Plan (CAP)
 - c. service activities

The needs and services to respond to those needs must be determined at the local level: designated Community Action Agency (CAA).

For Monitoring:

- the agency should ensure its Needs Assessment on the impact of the pandemic in their service area clearly identifies the most urgent needs
- the agency should ensure their Community Action Plan clearly states the strategies and services it plans to implement to meet the needs identified in the CNA
- the agency should conduct periodic on-going needs assessments to see if the identified needs have changed or if new needs have arisen. This can be done through a scaled back approach with notes kept on documenting the process used, date and results

Reference resource: *CSBG Organizational Standards Technical Assistance Guide Category 3 Community Assessment*

Question 2:

Is an updated “Needs Assessment” necessary? Do we need to do a revised CNA?

Answer 2:

A formal needs assessment is not necessary; however, it is necessary to document some knowledge of your community’s updated needs in response to the COVID-19 pandemic. You need to document in some way that you are aware of your needs. You do not need to complete a new formal needs assessment. An update to your last CNA will suffice. Refer to ODOC’s *CAA Implementation Manual, Addendum 2020-001 (ROMA section)* for more information.

Question 3:

Is an updated Community Action Plan (CAP) required?

Answer 3:

Yes, it is required - a Community Action Plan is a condition of CSBG funding; however, CAAs do have maximum flexibility on the plan's content and structure. Agencies can either submit a revised CAP that includes COVID related activities or can submit a COVID Plan as an addendum to your current CAP. The updated CAP must be uploaded to OKGrants in the application uploads section by July 30, 2020. It does not need to be uploaded before your contract is issued.

Question 4:

What if a new need has developed since we first assessed the needs in the summer of 2020? Can we revise our CNA or CAP?

Answer 4:

Yes, the needs assessment should be on-going throughout the public health emergency. If a new need has developed, simply update your CAP to reflect the new strategy and upload it into OKGrants with your CSBG CARES contract application.

Question 5:

With regard to updating the community needs assessment, does that mean CAAs can change what we plan as our outcomes?

Answer 5:

Yes, you can update your agency's Community Action Plan (strategies and outcomes) as needed when new needs have been identified in the local community needs assessment. If/when the Community Action Plan is revised, upload it into OK Grants.

Question 6:

What kinds of expenses can my agency use CARES funds for? Is there a list of allowable expenses?

Answer 6:

Allowable expenses must meet the two criteria:

1. CSBG CARES funds must be used to help prevent, prepare for or respond to the coronavirus.
2. Expenditures must be in alignment with the agency's Community Needs Assessment and Community Action Plan addendum for the local response to the pandemic.
3. The key for ALL CSBG expenses is to be consistent with the standard statutory CSBG framework outlined in the CSBG Act:
 - a. Must be based on a model of community-level needs assessment (CNA) and be an identified need
 - b. planning – Community Action Plan (CAP); service activities must be determined at the local level by the designated Community Action Agency (CAA) and be included in the CAP.

Significant things to note:

- When conducting the on-going needs assessment for the pandemic, it is important to rank the identified needs and address the highest ranking needs first. The intent is for the greatest needs to be addressed to achieve the greatest impact
- The Needs Assessment should also identify other community resources available and include gaps in available resources. If the greatest needs are not something your agency can do, your agency should consider what can be done to partner or create linkages within the community to address those unmet needs with referrals to other resources.
- It is important to identify barriers to addressing the greatest needs and use that information to move forward.

For Monitoring:

- the agency should ensure its Needs Assessment clearly identifies the most urgent needs as well as existing community resources
- the agency should ensure their Community Action Plan clearly states the strategies and services it plans to implement to meet the greatest needs identified in the CNA

Reference resource: *CSBG Organizational Standards Technical Assistance Guide Category 3 Community Assessment & Technical Assistance Guide Category 4 Organizational Leadership (includes standards for CAP)*

Question 7:

What outcome reporting is required for the CSBG CARES funds?

Answer 7:

There are 3 types of outcome reporting required for the CSBG CARES funds:

1. A Quarterly Outcome Report is required to be uploaded in OKGrants for any funds expended during that quarter. A chart of outcome report due dates is included in ODOC's *CAA Implementation Manual, Addendum 2020-001* located on ODOC website's CSBG information page: <https://www.okcommerce.gov/community-development/community-action-agencies/community-services-block-grant-programs/>
2. Outcomes must be reported in the regular CSBG annual report for the January through December period for 2020, 2021 and 2022 calendar years.
3. Outcomes must be reported in the *Supplemental CSBG annual report* for the January through December period for 2020, 2021 and 2022 calendar years.

Note: All services paid with CSBG CARES funds must be entered into CAPTAIN using the CSBG-COVID fund source to ensure the data is maintained separately for reporting purposes.

Question 8:

Since the Outcome Report template is optional, what specific format/information should be included in the quarterly Outcomes Report required by ODOC for CSBG-CR contracts?

Answer 8:

The quarterly Outcomes Report for CSBG CARES activities should include the following:

1. Provide a description of the activities the funds were spent on
2. Connect each activity to one of the annual report categories (domains/NPIs) and
3. Provide the outcome(s) for each activity

There is no required format; however, ODOC has created a template that can be used or CAAs can develop their own equivalent report. This tool is being distributed with the FAQ and is also available upon request via email to Paula.Jennings@okcommerce.gov

Question 9:

Not all services have an immediate outcome. For the outcome report, do we wait until an outcome is achieved to report on it?

Answer 9:

You should be reporting outcomes during each quarter for funds that have been expended. If you have expended funds that has not yet achieved an outcome, report on the expected outcome and include the target date you plan to achieve it.

Question 10:

What types of outcomes should we report on – just client services?

Answer 10:

Agencies should report outcomes for ALL activities that were expensed with the use of CSBG CARES funds. Examples include (but not limited to):

1. Client services such as emergency rent, food or utility assistance
2. Agency capacity building expenses such as technology for remote meetings/staff training and to allow remote work
3. Expenses to prevent the spread of the Coronavirus such as cleaning & PPE.
4. Partnership activities funded with CSBG CARES dollars
5. Staff salaries funded with CSBG CARES dollars
6. Any other expense paid with CSBG CARES dollars

Note: CSBG CARES funding has the following restriction:

Funds must be used to prevent, prepare for or respond to the coronavirus.

Question 1:

Are there Program Guidelines forthcoming? For example, a list of specifically disallowed costs?

Answer 1:

If a cost is CSBG eligible, and addresses a documented COVID related need, and supports the community action mission, it is allowable. The exception is the purchase of property or permanent improvements to properties, which is the same as the regular CSBG funds. Refer to ODOC's *CAA Implementation Manual, Addendum 2020-001* for more information on allowable expenses.

The state requirements can be located on ODOC website's CSBG information page: <https://www.okcommerce.gov/community-development/community-action-agencies/community-services-block-grant-programs/>

Question 2:

Is partnering with mobile meals a good idea?

Answer 2:

Yes, if your agency's needs assessment identified the need for food and the recipients meet the income eligibility guidelines and have a need related to COVID.

Question 3:

Can/Should a CAA spend their CARES contract at the same time as the regular contract?

Answer 3:

Yes. The period of the CARES contracts will be 03/27/2020 through 09/30/2022. Your regular CSBG 2020 contract is effective 01/01/2020 through 09/30/2021.

Question 4:

We are a CAA and own apartments where residents have COVID related needs. Can we pay ourselves?

Answer 4:

Yes; however, it will require extra transparency, and, you must ensure that you are not neglecting any other similar client. You cannot deny services to another client with the same need when you're paying the rent on an apartment you own. Do your due diligence to track the funds separately, serve all clients regardless of who owns the property, and don't prioritize your own residents. (**NOTE:** This guidance is intended for the CSBG Program only. You must check for specific program guidance e.g. ESG before obligating/expending those funds.)

Question 5:

What are the income eligibility guidelines for CSBG CARES?

Answer 5:

Under the CARES Act, you 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. HHS Poverty Guidelines for 2020 can also be found at: <https://aspe.hhs.gov/poverty-guidelines>

Question 6:

What documentation should be kept regarding the income eligibility determination?

Answer 6:

Neither the CSBG Act, HHS regulations nor ODOC requirements specify the records a CAA should keep regarding the determination of an applicant's eligibility for CSBG benefits/services. **At a minimum, a CAA should retain documentation sufficient to demonstrate that staff screened applicants for income eligibility.** Following are two possible examples of the records that could be kept to document the fact that an agency reviewed a client's income and determined the client to be eligible for CSBG services/benefits:

Example 1: CAA maintains an income verification form or intake form that identifies:

1. which documents staff examined (application, check stubs, SS Letter, etc)
2. the amount of annualized **household** income
3. staff documents that the applicant is eligible for CSBG services/benefits
4. The statement is signed and dated by an employee who reviewed the documentation and determined the applicant to be eligible for CSBG services/benefits.

Where an applicant claims no household income, the CAA maintains the form attesting to that fact signed by the applicant and the staff member who attempted to verify the applicant's household income.

Example 2: CAA keeps an eligibility determination record for each applicant for CSBG services/benefits, which includes:

1. Copies of all documents submitted by the applicant relating to the applicant's eligibility for services and any staff member's notes recording any other information related to eligibility received from any source
2. A signed and dated statement by the applicant certifying that the documents and information that the applicant provided concerning eligibility are accurate
3. Documentation establishing that a staff member has sought to verify the accuracy of the information on eligibility provided to the eligible entity by:
 - a. Conducting an in-person interview with the applicant; and
 - b. Seeking information from third parties who have first-hand knowledge about the applicant's eligibility in cases in which no documentation regarding the income eligibility of the applicant has been received by the CAA. The record should include the names, titles, and affiliations of the third parties, and the applicant's signed consent form permitting the CAA to contact each particular third party
4. A signed and dated statement by the staff person who made the eligibility determination certifying that the information on eligibility in the file is accurate to the

best of the person's knowledge, and based on that information, the person has determined the applicant to be eligible for services.

For Monitoring: submit the agency's income verification documentation and the applicant income documents.

Reference resource: *CAPLAW's Q&A on CSBG Client Eligibility*

Question 7:

What documentation is required for an agency to verify income/eligibility?

Answer 7:

See answer number 6 for specific income verification documentation. In addition, CAAs are required to develop program policies for services funded by CSBG CARES Act funds. **Your agency's program policies must describe how your agency verifies eligibility and the documentation you require.**

A handy reference document that CAPLAW put together may help in the process of developing program policies (remember, there are **new CSBG eligibility guidelines** for the CARES program):

https://www.capl原因.org/resources/PublicationDocuments/CAPLAW_ClientEligibility_Sept2013.pdf

ODOC's Emergency Solutions Grants has a "Documentation by Income Types" reference tool that describes types of income to be included and those that should be excluded when verifying income eligibility. This tool is available upon request – submit email request to Paula.Jennings@okcommerce.gov

Question 8:

If a client has section 8 housing, are we allowed to pay the client's portion of the rent through emergency services?

Answer 8:

Yes; however, only the client's portion can be paid and documentation for transparency should be in the client file such as documentation that the client has gone or will undergo the recertification process and still owes a portion of the rent and the total amount paid will not exceed the client's portion of the total rent.

Question 9:

We plan to hire individuals to help clean our buildings to ensure we are cleaning/sanitizing appropriately during the pandemic. In the past, we have simply hired them as part-time workers. Would this be true for this grant or do we need to treat them as sub-contractors and go through ODOC for approval?

Answer 9:

You can continue to hire janitorial staff as part time employees.

Question 10:

Can a client in a domestic abuse situation that needs assistance with a program utilizing CARES funds self-certify income even if it is not their income, but the abuser's income?

Answer 10:

Agencies are required to have written program policies that detail how eligibility & income is verified. The agency program policies can allow self-certification in domestic abuse situations but the process for that must be included in the written program policies.

Note: If a victim of domestic violence has fled a home, they are no longer part of that household and don't need to use the partner's income in their application for services.

Question 11:

Can CARES funds be used for clients' travel expenses to medical appointments, such as gasoline vouchers?

Answer 11:

Yes; however, the travel expenditures would *only* be considered allowable if:

1. There is adequate supporting documentation for the expense to prove the expense was used for the purpose intended **and**
2. There is adequate supporting documentation to prove the amount paid did not exceed the actual amount needed.

Establishing actual need: *The agency program policies must describe how the agency establishes the amount of travel expense needed for each client on a case-by-case basis.* Actual expenses needed will vary from client to client and there are many variables to consider when calculating travel expenses such as miles per gallon and/or mileage rates, distance traveled, etc. An agency must be able to ensure the amount paid to the client for the travel expense does not exceed the actual need. This would have to be calculated on a case-by-case basis with documentation of the calculations for the needed amount of travel.

Supporting Documentation: *The agency program policies must include extra safeguards when making payments directly to clients to ensure the funds are spent in their entirety for the intended purpose.* When an agency gives cash (or even a gasoline voucher) to a client, how those funds are spent are out of an agency's control. The agency policies must include protocols to ensure the funds were spent as intended when paying travel expenses in advance and the agency must have supporting documentation that supports & verifies the funds were spent as intended.

Question 12:

With regard to COVID verification - how do you suggest documenting COVID related needs? Do we have to provide proof that someone lost their job due to COVID vs regular layoff?

Answer 12:

The best way to obtain this information is to ask the client; then document their response about their situation. As example, the loss of a job may not be COVID related, but the inability to find a job because of the pandemic makes their situation COVID related.

Question 13:

With regard to documentation, does the client have to show proof/paper documentation of income (more than just a client statement)?

Answer 13:

Yes, you do need income documentation from the client (paper or electronic).

Question 14:

What about situations where our agency is not spending the CARES funds because the agency is having a hard time getting clients to provide all of the necessary documentation?

Answer 14:

Some suggestions are: to utilize the remote intake portal; some agencies are doing intake by appointment and notifying clients that a lack of information will result in assistance not being available - making appointments cuts down on missing paperwork - when clients make their appointments, they are given a list of what they need to bring. Communicating ahead of time what the client needs to bring, and appointments only, is beneficial.

Question 15:

Are there spending frequency requirements for the CARES funds like some other grants such as ESG?

Answer 15:

No, there are no spending frequency requirements for CSBG CARES funds. However, an agency should periodically assess their spending rate and compare it to the amount of time remaining in the contract to ensure funds are expended within the grant period.

Question 16:

When should an agency have a subcontract agreement instead of an MOU?

Answer 16:

A subcontract agreement is necessary any time you give money to a partner organization to provide services per your CSBG CARES contract part II; part I.C: *Work and services covered by the CSBG CARES contract may be subcontracted but must receive prior written approval of ODOC.*

Agencies should have a policy in place that defines when MoUs and Subcontract Agreements are used. Both MOU and subcontracts are two ways of entering into a form of agreement. The key difference between an MOU and a subcontract is that **MOU is an agreement between two or more parties that is not legally binding** whereas a **subcontract is a legally binding agreement between two or more parties that creates an obligation to do (or not do) a particular task.** Apart from this main difference, both MOU and contract are largely similar in terms of the objectives.

- **Memorandum of understanding (MoU)**
 - a type of agreement between two or more parties and is used to describe how the parties will work together on a shared objective, project or mission

- more formal than a handshake and less formal than a contract, an MoU is an expression for two parties that documents a business relationship with another community provider to meet community needs
- An MoU contains goals and purpose of the partnership but does not include terms
- **MoUs are NOT legally binding.**
- Example: MoUs are commonly used for collaborations with a partner to define the parameters of the collaboration to eliminate duplication, such as a collaboration with the local Workforce (WEOLA)
- **Subcontract agreements**
 - are required to be used when a CAA hires a partner to perform community action work
 - contains goals and purpose of the partnership, terms for payment, description of services to be rendered, information related to fees for services, compliance requirements and recordkeeping requirements
 - an intention between the parties to create a binding relationship that creates an obligation to do a particular task
 - **Subcontract agreements ARE legally binding.**
 - Example: when a CAA pays a partner to provide services such as emergency assistance services, weatherization work, homeless shelter services.
 - Example: When a CAA provides goods to a partner, many situations may rise to the level of a subcontract agreement. For example, providing PPE to a partner could be done under an MoU, but providing bulk food to a food bank may be better performed under a subcontract agreement because it is legally binding and because of the compliance and documentation requirements for ensuring that income eligibility guidelines are carried out or other compliance requirements such as documenting a COVID impact

For Monitoring: the agency should ensure it has a written subcontract agreement in place for any situations where the agency hires a partner to perform community action work (CSBG-CR Contract Part II.1-C).

Question 17:

If an employee is eligible for emergency services, what is the process to address the conflict of interest? Can an agency's employees receive services if they are income eligible?

Answer 17:

Yes, an employee of a CAA can receive services; however, the agency must follow ODOC's requirement to address the conflict of interest on a case-by-case basis.

The requirement for this can be found in ODOC's CAA Implementation Manual, Requirement #111.

Question 18:

Should the agency Program Policies be revised mid-contract to increase maximum amounts allowable for emergency services?

Answer 18:

Yes, they can be amended if the CAA has determined a need to increase the maximum amounts a client can receive. Once the Program Policy amendment is completed, upload the revised policy into OKGrants with your CSBG CARES contract application.

Question 19:

Would it be helpful to learn about some of the initial monitoring findings from the quarterly reviews to avoid common mistakes among us?

Answer 19:

The most frequent monitoring findings from the first 3 quarterly monitoring reviews (March through December, 2020) are:

- A. A lack of documentation on purchase orders to show the purchase was related to the pandemic
- B. A lack of documentation sufficient to demonstrate that staff screened applicants for income eligibility and verified that their income met the income requirements.
- C. Outcome reports are not submitted, late or do not include outcomes for all the funds that have been spent. Many outcomes have been omitted such as “increased agency capacity” with the purchase of technology items or “prevented the spread of the Coronavirus” with the purchase of PPE and/or office cleaning
- D. Agencies implementing strategies that are not included in their Community Action Plan - Solution: revise the agency’s CAP to reflect all identified needs and strategies the agency plans to implement.

Question 20:

Can an applicant receive emergency assistance services (mortgage payment) if that individual is going through bankruptcy?

Answer 20:

ODOC staff researched this question and cannot find any information to indicate that bankruptcy makes a person ineligible for CSBG funded services. Since CSBG is income based, not asset based, we do not think bankruptcy would disqualify an applicant as long as the person qualifies for assistance by the required program income standards that everyone else qualifies under (and is impacted by the pandemic if an applicant for assistance paid with CARES funds). **However, you should make sure that the home is not at risk of foreclosure before you proceed with assistance.**

Question 21:

Is there a citizenship requirement for clients seeking services (e.g., emergency rental assistance and/or free legal representation at an eviction hearing) through CSBG CR-funded programs?

Answer 21:

Citizenship is **not** a requirement, per se. In order to verify income, your agency might require documents that would be hard to get if the applicant is not a citizen, but that in and of itself would not prevent the individual/family from getting services.

Federal guidance on this topic:

https://www.acf.hhs.gov/sites/default/files/ocs/im_no_30_guidance_on_the_interpretation_of_federal_public_benefits.pdf

Non citizens, regardless of their alien status, should not be banned from Community Services Block Grant programs based solely on their alien status unless such exclusion is already authorized by another statute.

Question 22:

Is Hazard Pay allowable with CSBG CARES funds?

Answer 22:

Yes, but your agency needs to have a board approved policy for hazard pay. The policy should identify the following at a minimum: Who, What, When, Where and How

- Define what job titles are eligible for Hazard Pay
- How long will HP be allowable? Timeframe (E.g. aligns with Governors emergency declaration and expires 30 days after end date?)
- Define how Hazard Pay is calculated for each of the positions that are eligible for hazard pay

Question 23:

What expenses are allowable with CSBG CARES funds?

Answer 23:

Allowable expenses must meet the following two criteria:

1. CSBG CARES funds must be used to help prevent, prepare for or respond to the coronavirus.
2. Expenditures must be in alignment with the agency's Community Needs Assessment and Community Action Plan addendum for the local response to the pandemic.

Note: Building improvements are NOT an allowable CSBG expense.

For Monitoring: The agency should ensure that purchase orders document how the expenses are COVID related

Example 1:

A purchase order for PPE supplies such as masks, sanitizer, thermometers, etc. should include documentation in the description to say "to prevent coronavirus"

Example 2:

A purchase order for equipment or supplies to allow the agency to continue operations during a pandemic should include documentation in the description to say "for remote work" or "agency capacity during pandemic"

Reference resource: *CSBG Organizational Standards Technical Assistance Guide Category 3 Community Assessment & Technical Assistance Guide Category 4 Organizational Leadership (includes standards for CAP)*

CARES Act and Duplication of Benefits (DOB)

Question 1:

What is a duplication of benefits (DOB)?

Answer 1:

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

Question 2:

Is duplication of benefits (DOB) a new requirement for CSBG?

Answer 2:

No; subgrantees of CSBG funds have always been expected to coordinate, and establish linkages between, governmental and other social services programs to assure the effective delivery of services to low-income individuals and to avoid duplication of such services. In the past, CAAs have been expected to have an informal process to avoid duplication of services but were not required to have a formal written process to prevent DOB.

Oklahoma CAAs have been very successful in coordinating their service delivery to avoid duplication of services. However, there are currently numerous organizations with CARES funds as well as other sources of funding to address the needs resulting from the pandemic, making this coordination much more challenging. That is the reason a more formal written process is now required to prevent DOB.

Question 3:

How does my agency prevent a duplication of benefits (DOB)?

Answer 3:

The specific coordination to prevent DOB will usually have to happen where eligibility determinations are made, which is at the local agency level. This is generally done during the intake process.

CAAs must develop written procedures to prevent duplication of benefits to ensure this duplication of benefits analysis happens before providing CSBG-CR assistance and the CAA should only pay for unmet needs/needs not met by other sources of assistance.

Question 4:

Can CSBG funds be combined with other funding sources to meet clients' needs?

Answer 4:

CSBG does not have a limitation. More than one source can be used as long as the **total** received from all sources does not exceed the **total** need. The key is to establish the need at intake and find out if any other sources have paid or are expected to pay. The focus should be on the actual *benefit* (what the client receives and/or is paid on their behalf); that's the part that can't be duplicated or it would be considered double-dipping.

Please be aware that other funding sources such as ESG CARES and CDBG CARES may have limitations or programmatic restrictions. For example, the CSBG Disaster Relief Program would need to exhaust insurance and FEMA before utilizing federal funds for assistance.

Question 5:

Would it be considered a duplication of benefits for a CAA using CSBG CARES funds to provide emergency assistance services to an eligible individual in June and again in October?

Answer 5:

CSBG rules would not prohibit this. However, this would depend on how the eligibility period was defined by the agency's program policies as well as definitions of exactly what emergency assistance services entail. This may differ by funding source.

Question 6:

We started helping families well before the CARES guidelines were finalized. How can we go back and get people to agree to repay if there is duplication?

Answer 6:

There may be a period of time prior to program policies or DOB requirements where there may not be documentation for clients, but agencies should now have a process developed and implemented. What's important is what you do moving forward.

Question 7:

Should there be a landlord attestation for the DOB?

Answer 7:

There is no specific requirement for a landlord attestation, but it is a best practice that landlords agree that if they do receive a duplicate payment, they will pay it back.

Helpful Resources

Community Needs Assessment COVID-19 Template

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>

<https://www.acf.hhs.gov/ocs/resource/covid-19-resources-for-ocs-grantees-partners-and-stakeholders>

<https://nascsp.org/coronavirus-resources/>

<https://govstatus.egov.com/oklahoma-coronavirus-information>

https://communityactionpartnership.com/search-page/?fwp_post_type=webinar

<https://www.caplaw.org/resources/coronavirusupdates/coronavirusnonprofitguidance.html>

Recorded roundtable sessions and ODOC's CSBG CARES Program Requirements are located on the ODOC website's CSBG information page:

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