

CSBG Network Conference Call Q&A

April 23, 2020

The Texas Department of Housing and Community Affairs (The Department) has created the following document to assist its Subrecipients to answer applicable program questions. The document contains answers to the questions the Department received related to the multiple CSBG awards due to COVID-19.

If after reading and referencing all these materials you still have questions, you may submit a program question by completing this form: <https://tdhca.wufoo.com/forms/request-for-ca-program-assistance/>

1. Will all CSBG contracts align with the CARES Act income eligibility threshold of 200%?

Yes, all carryover, current, and discretionary contracts will increase to 200%FPL, effective 3/27/2020.

2. Why was the regular CSBG moved to 200% FPL?

It was determined that all CSBG awards would use the same FPL of 200%. This allows the option to use any regular CSBG emergency funds for COVID clients, if needed. However, the regular CSBG funds should remain prioritized for the goals and purposes of your PY20 CAP. 125%. Refer to slide 3 of CSBG Network Call on 4/23/2020.

3. Are there any restrictions regarding households over 125% or for the COVID issued contracts?

The only restriction is that these household must have a documented COVID-related need. Documentation may be client statements in case notes. If the client can provide backup documents, such as: job loss notice, unemployment, online schooling mandate, this would be best.

4. How does the FPL increase affect TOP? Will TOP be increased to 200% or remain at 125%?

In order to maintain the statistical integrity of TOP data, TOP reporting will remain under the rule of 90 consecutive days above 125%FPL. This means that only clients who have a starting income at or below the 125% FPL are eligible for case management toward TOP numbers reported.

5. If a client TOPs above 125%, can we still serve them until they reach 200%?

Clients, who are reported as TOP, can continue to be served through December 31st of their application year if they need additional assistance.

6. Is there a complete list of COVID-related reasons?

No, there is not a list as we cannot anticipate the various types of assistance that may be related to COVID-19. This will need to be on a case-by-case basis as to what happened due to COVID-19, that wouldn't have happened if this pandemic didn't occur, that has caused the need.

7. What about COVID-related job loss clients who need case management for employment?

If they enter the program at or below 125%, and meet the TOP criteria, you may report these households towards your TOP goal. If they are above 125% at application time, they may receive case management and all related services. You will report the services provided (SRVs), and any outcomes achieved (FNPIs), but you will NOT report these household numbers toward TOP goal.

8. How will the CARES funds be allocated and how long do we have to expend these funds?

The Department will use our standard CSBG allocation formula for these funds. The full award amount for each Subrecipient will be issued in a one year contract, as it is anticipated that the most COVID-related needs will be emergency assistance and will diminish over time once the health disaster is lifted. The Department will consider extensions, if the need arises.

9. Would layoffs from the oil fields be a COVID reason?

Yes, if the layoffs are due to low fuel prices causing the oil companies to reduce production from COVID-19.

10. If a Head Start parent now has to pay for childcare because the Head Start Center is closed, is this a COVID reason?

Yes.

11. To confirm, is mortgage assistance allowed?

Yes, it is allowable if offered to avoid the household being at risk of homelessness. Your agency should have a clearly outlined Matrix of when this assistance will be offered: risk condition, how many times and for how much. It is recommended to set a dollar threshold per month and limit the number of months for such assistance. This way all staff are treating households equitably.

12. Do COVID applicants need to be run through SAVE?

No. CSBG clients are not subject to SAVE or Citizenship Verification requirements. Those requirements are only for CEAP, LIHEAP-WAP, and DOE-WAP.

13. Can we support our 211 partner with CSBG CARES funds?

You cannot give money without oversight and reporting the uses, services, or outcomes. If 211 needs additional staff, your agency staff could assist with provision of referral activities.

14. Can we outsource client intake?

It is allowable, per CSBG Contract Section 16 A to subcontract for the delivery of direct client assistance. However, for any outsourced activities, the Subrecipient is responsible for oversight of program requirements performed by the outsourced organization. You must also, properly procure for organizations with whom you will outsource.

15. How do we handle staffing costs, as we may need to hire?

If you are hiring temp staff, you will need to properly procure for a temp agency. Any staff that is brought on permanently or temporarily will need to be properly allocated across your contracts, depending upon their identified duties and actual work performed.