

Community Services Policy Manual

# 200 Series

Emergency Policy

# 200 SERIES GENERAL POLICY

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## 200 SERIES GENERAL POLICY

### 200 EMERGENCY POLICY DURING CORONAVIRUS PANDEMIC

**EFFECTIVE DATE**                      **April 14, 2020**

#### **PURPOSE**

These policy item changes will be in effect during the Coronavirus (COVID-19) pandemic. These changes will overwrite original policy items. They remain in effect until BCAEO states otherwise. This policy may change suddenly and often as more information becomes available.

#### **POLICY CHANGES**

New Policy

#### **POLICY**

Governor Whitmer, in an effort to protect all Michiganders, signed [Executive Order 2020-21](#) March 23, 2020 that directs residents to remain at home or in their place of residence to the maximum extent feasible. A summary of her, "Stay Home, Stay Safe," Executive Order is available online.

Community Action Agencies (CAAs) are identified as essential critical infrastructure workers, as required by the Community Services Block Grant (CSBG) Act in providing emergency services, housing, nutrition, healthcare, transportation, and other anti-poverty programs to low-income individuals and families.

In addition, the Governor's Executive Order 2020-21, section 8, identifies several areas of essential critical infrastructure workers. CAAs are defined within the category of Health Care and Public Health, which states essential critical infrastructure workers are "workers who support food, shelter, and social services, and other necessities of life for economically disadvantaged or otherwise needy individuals, such as those residing in shelters".

As such, CAAs are classified as essential critical infrastructure workers during the State of Michigan COVID-19 pandemic. Your agency is instructed to adhere to the following guidance while maintaining emergency services to low-income individuals and families.

- Employers should explore whether they can establish policies and practices, such as flexible worksites (e.g., telecommuting, remote workstations) and flexible work hours (e.g., staggered shifts), to reduce the amount of staff in the business site and to increase the physical distance among employees and between employees to ensure social distancing strategies are followed.
- Promote frequent and thorough hand washing, including by providing workers, customers, and worksite visitors with a place to wash their hands. If soap and running water are not immediately available, provide alcohol-based hand rubs containing at least 60% alcohol.

1 For the purposes of this order, critical infrastructures workers are those workers described by the Director of U.S. Cybersecurity and Infrastructure Security Agency in his [guidance](#) of March 19, 2020.

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- Encourage workers to stay home if they are sick.
- Encourage respiratory etiquette, including covering coughs and sneezes.
- Provide customers and the public with tissues and trash receptacles.
- Discourage workers from using other workers' phones, desks, offices, or other work tools and equipment, when possible.
- Maintain regular housekeeping practices, including routine cleaning and disinfecting of surfaces, equipment, and other elements of the work environment.

On April 13, 2020, the Department of Health and Human Services, Office of Community Services released [CSBG IM 2020-157 Immediate Guidance on COVID-19 Response](#).

This document provides emergency guidance for both state CSBG lead agencies and eligible entities providing community support as part of a national effort to address the public health and economic impacts of the coronavirus disease, known as COVID-19.

Community Action Agencies (CAAs) can play a critical role in serving low-income individuals and families in communities, but this will require rapid adaptation of service delivery approaches in close partnership with public health and emergency management professionals within communities. Because the public health response to COVID-19 requires physical and social distancing, an effective immediate response to COVID-19 will require new ways of organizing and delivering services while maintaining capacity to help communities in longer-term recovery efforts.

### BOARD ISSUES

CSPM 209 & 210

#### E-Meetings

During the Coronavirus Pandemic, agencies can hold virtual board meetings through conference calls or webinars regardless of inclusion in their articles or bylaws. Quorums will be determined by who is on the conference call.

Board meeting minutes should note if the meeting was held virtually.

#### Board Vacancies

During the Coronavirus Pandemic, Board vacancies must be filled within 180 days. Agencies should make every effort to fill a vacancy as soon as possible.

### ASSET TESTING

During the Coronavirus Pandemic, Asset Testing is waived for all BCAEO-funded programs.

### APPLICANT SIGNATURES/NOTARY SIGNATURES/GM APPROVAL

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CSPM 502, 508, 601, 612, 701, 909

~~During the Coronavirus Pandemic and mandatory social distancing, the following practices can be used to temporarily substitute as client approval until the client signature can be obtained in person:~~

### **Grant Manager Approval for Zero Income**

Grant Manger approvals are temporarily waived for zero income self-declarations.

### **Notary Signatures**

For CSBG, CSBG-D and CARES programs required notary signatures are temporarily waived. For DOE and LIHEAP programs, clients may temporarily self-certify that they have no other proof of income however a notarized statement later will be required once the area is in Phase 3 of the Guidelines for Opening Up America Again (the Guidelines).

### **Client Signatures**

During the Coronavirus Pandemic and mandatory social distancing, the following practices can be used to temporarily substitute as client approval until the client signature can be obtained in person:

- Video chatting (FaceTime, Skype, etc.) can be used to obtain client approval. This can be achieved by the client holding picture identification to the camera and the intake specialist taking a screen shot to show they spoke with the client and the text message portion of the media app will be used for the client to document and state their approval. This text message portion could then be printed/saved along with the screen shot of the photo ID to keep on file as temporary client approval.
- The Community Action Agency (CAA) can email the client a scan of the document to sign. The client can then print the document, sign it, place their photo ID next to the signature line and take a picture of the signed document (with photo ID included in the photo) and send the photo back to the CAA in a text or email. If the client does not have access to a printer then they can reply to the email from the CAA and attach a picture of their photo ID to that email while stating their approval in the email.
- If the above options are not available to the client, they can use voicemail by either:
  - Calling the CAA main line and leaving a voice message stating their name (along with a client PIN, file number, etc.) and their approval of the information obtained by the CAA during the intake process on X month and X date.
  - Calling a cell phone and leaving a voicemail message. The text version of this voice mail would be retained to document temporary approval. The information contained in a) above should be included in this voicemail.

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- The CAA could mail the form(s) to the client for approval, the client could then sign and mail them back to the CAA. However, unless the client includes a notary approval with their signature this method will only be used as temporary approval.
- If the agency has electronic signature software, that is allowable.
- If none of the above methods will work for the CAA to obtain necessary client approval for intake (client only has access to a land line, etc.), then the intake specialist can document their phone conversation with the client stating the date, start and end time of the discussion, client, and general description of what was discussed, and the client gave verbal approval of this information. The COVID-19 HMIS Oral Release of Information Phone Script document can be used to document this information. This can be found in [SharePoint](#).

Sufficient reasoning must be documented, and kept with the approval, as to why the specific method of obtaining temporary approval was used. This information must be retained and kept along with the documentation signed in person (when it is obtained) as this will be subject to the normal monitoring procedures and will be used to support the start date for services.

### ELIGIBILITY GUIDELINES

#### INCOME ELIGIBILITY DETERMINATIONS

CSPM 502 and 909 and Contract Language

**CARES** funding will use the **200%** of poverty income guidelines to determine eligibility for services provided with CARES funds.

**CSBG** funding will increase income eligibility to **200%** of poverty income guidelines to determine eligibility for services provided with CSBG funds during fiscal year 2020 and fiscal year 2021. This change will occur on April 1, 2020 and go through September 30, 2021.

#### ENTERING INCOME IN FACSPRO

1. Income information can be entered into the Income screens of FACSPRO to compute whether the household is under the 200% FPL threshold and thus income eligible for CSBG – CARES  
OR
2. For households determined to be automatically eligible for CSBG – CARES, agencies can check the *CARES auto eligibility* box in Demographics under Characteristics. See FACSPRO Guide in [SharePoint](#).

#### AUTOMATIC ELIGIBILITY FOR EMERGENCY SERVICES

If a client is/was currently enrolled in another Federal or State program that does not exceed 200% of poverty in the current fiscal year, they are automatically eligible.

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**NOTE:** All household members must be included in the determination.

Other programs may include, but **are not limited**, to the following:

*Food Assistance, Head Start, Medicaid, School Lunch Aid, State Disability Assistance, State Emergency Relief, Temporary Assistance for Needy Families, Unemployment*

CAAs may use the following:

1. Self-declarations or affidavits of eligibility.
2. Accepting eligibility certification paperwork from another Federal or State program as long as they do not exceed 200% of the Federal Poverty Level.

Grantees must maintain client eligibility documentation for the service the client was, or is, eligible for using FACSPRO or an alternate system approved by BCAEO. In addition, agencies are required to keep information on clients served as well as an indication/notation identifying what agency program or service the client (household or household member) is eligible for in the FACSPRO system or an alternate system approved by BCAEO.

### EXCLUDEABLE INCOME

During the Coronavirus Pandemic, the following income can be **excluded** for CSBG and CARES income eligibility:

- Unemployment income
- CARES ACT Stimulus check

For DOE and LIHEAP, CARES Act stimulus checks are **excluded** as income. Unemployment income, including the additional \$600 per week, are **included** as income. [The additional \\$600 per week was discontinued on July 25, 2020.](#)

### REDETERMINATION

During the Coronavirus Pandemic, [for CARES and CSBG,](#) redeterminations for eligibility do not have to be completed for clients that have received CSBG services in the past 12 months (1 year).

**Reminder:** Agency may use the income eligibility exception rule where necessary.

### LOOKBACK PERIOD

During the Coronavirus Pandemic, for **CARES** and **CSBG**, the lookback period for client applications will be changed from three (3) months to thirty (30) days including the application date.

**NOTE:** If a client is/was enrolled in an auto-eligible program during the current fiscal year, they are eligible.

**NOTE:** The lookback period for client income for DOE and LIHEAP WAP has not changed.

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### **DUE DATE EXTENSIONS**

~~ALL CSPMs included (with the exception of CSPM 602)~~

~~During the Coronavirus Pandemic, all due dates will be extended by 90 days. This includes, but is not limited to Statement of Expenditures, reports, etc. The exception to this extension is Weatherization Statements of Expenditures and production reporting. Production reports must still follow the normal due date schedule as defined in CSPM 602. If you have a specific question, please contact your grant manager.~~

### **COMMUNITY NEEDS ASSESSMENTS**

It is expected that agencies will continue to conduct community needs assessments within the required three-year timeframe. If you run into an issue, please contact your grant manager.

A Community Needs Assessment Addendum will be required for the CARES funding.

### **ORGANIZATIONAL STANDARDS**

It is expected that agencies will continue to follow the Organizational Standards. If you run into an issue, please contact your grant manager.

### **SUPPORT COST CATEGORY**

CSPM 402.2, 402.3

The maximum amount for “support” of 35% of the Grantee’s DOE and/or LIHEAP allocation is waived during PY19 due to the face-to-face hiatus. ~~If the hiatus is lifted during PY19 an assessment will be done of current spending to re-assess an appropriate limit, if appropriate. In the PY19 & PY20 allocation chart, this exception is not considered. If a Grantee needs an exception to the allocation chart limit for Support, contact your BCAEO grant manager. If necessary, BCAEO will review the agency’s spending during the hiatus and determine the appropriate adjusted limit for Support.~~

### **TECHNICAL WAP MONITORING**

CSPM 603

During the Coronavirus Pandemic, ~~it is possible that the~~ BCAEO Technical Weatherization monitors ~~will did~~ not have the opportunity to do an onsite inspection at every agency in PY19. ~~If Since~~ BCAEO Technical Weatherization monitors ~~are were~~ unable to meet the 5% minimum site visit during PY19, they will make up for the deficit in PY20. BCAEO Technical Weatherization monitors will begin onsite inspections once the travel moratorium for state staff is lifted.

### **COMPLETING WEATHERIZATION JOBS**

CSPM 606

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Grantees must complete the weatherization of a home within 6 months of conducting the energy audit. Jobs that are not completed within 6 months of the energy audit require an additional, up to date, energy audit to be performed. However, the time during the COVID-19 face-to-face hiatus does not count toward the 6 months of a valid energy audit. For non-vulnerable clients, the timeframe that does not count is when the Grantee ceased field work through the approval of the Grantee's re-entry letter (approximately March 18, 2020 – June 1, 2020, specific dates will be reviewed for each Grantee). For vulnerable clients, the timeframe that does not count is when the Grantee ceased field work through August 6, 2020.

### PRIOTIZATION OF CLIENTS

~~Place eligible vulnerable clients on a waitlist, giving them priority once the state or local jurisdiction is implementing Phase Three of the Guidelines. Vulnerable individuals include: Elderly individuals; and individuals with serious underlying health conditions, including high blood pressure, chronic lung disease, diabetes, obesity, asthma, and those whose immune system is compromised such as by chemotherapy for cancer and other conditions requiring such therapy.~~

Deferral process & tracking is needed for any clients who decline a Grantee's entry into their home due to COVID-19 concerns, or clients that are not able to be served immediately due to COVID-19 illness. Deferral timeframes should align with CDC recommendations, and agency staff comfort to minimize exposure in working environments. Grantees may use the Deferral – COVID queue in FACSPRO for these clients or may track externally from FACSPRO, but this list must be available upon request.

### COMPREHENSIVE WEATHERIZATION TRAINING

#### CSPM 618

Individuals working in any JTA who had not received Comprehensive training in the past three program years, had to participate in Comprehensive training in PY19. If individuals working in a JTA were unable to participate before the COVID-19 face-to-face hiatus, they will be able to participate in their JTA's Comprehensive training during PY20. Effective July 1, 2020, CSPM 618 has been updated to reflect the adjusted deadlines.

### WAP QUEUE MOVEMENT

#### CSPM 905

Any queue movement that requires face-to-face work with clients ~~has had~~ time period restrictions waived during the COVID-19 face-to-face hiatus. Once the hiatus was lifted, those time period restrictions are required again. Please see the "Completing Weatherization Jobs" item above for details on how to determine the hiatus timeframe.

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### WEATHERIZATION INSPECTIONS

CSPM 905:

In usual circumstances, approval for contractor payment is based on the job passing QCI. However, the delay of inspections caused by the COVID-19 face-to-face hiatus, could have created a substantial delay in contractor payment. For that reason, BCAEO approves Grantees' payment of contractors whose work hads not passed inspection solely due to the delay in a QCI from the face-to-face hiatus. Grantees should have considered the risk associated with the decision to make payment and the potential implication on call backs, for example. Grantees may also had the option to alternatively consider making a partial payment immediately and pay the remainder owed to the contractor after the inspection is was completed. With the hiatus over, the policy is no longer in effect for current payments. Please see the "Completing Weatherization Jobs" item above for details on how to determine the hiatus timeframe.

### BACKGROUND CHECKS FOR VOLUNTEERS

CSBG Contract Language

During the Coronavirus Pandemic, agencies will have a high need for volunteers and new staff to address the issues impacting the community. Agencies should follow their own internal policies. An ICHAT check will meet the contractual requirements for background checks of volunteers working directly with clients or having access to client information.

### MEAP

CSPM 1200:

The MEAP household assistance cap has been increased to \$3,000 from August 5, 2020-September 30, 2020. Please continue to use the normal exception process for households where assistance will exceed the \$3,000 cap.

Exception requests should be sent to [MDHHS-BCAEO@michigan.gov](mailto:MDHHS-BCAEO@michigan.gov). Requests may be found in the [MEAP Resource Library](#) in SharePoint. For households enrolled in APP, follow this [link](#); for households not enrolled in APP, please follow this [link](#).