EFFECTIVE DATE	August 1, 2020
REVISION DATE	October 22, 2020
ISSUE DATE	October 26, 2020

#### **POLICY CHANGES**

Reporting requirement updates – page 2 Added eligibility clarification -page 3 Removed application language (it is not a requirement) page 3,4 Removed signature language – not required to obtain at later date – page 4

#### SECTION I: BACKGROUND

#### PURPOSE

The Q-CARES Kit Assistance Program provides Quarantine Boxes with food and/or household items to low-income people that are in quarantine/isolation because they have tested positive for COVID-19, are waiting for test results, have been exposed to COVID-19, vulnerable, or are immune compromised. By providing the supplies, the target population can safely remain in quarantine and isolation, the chance of exposure to themselves and others is mitigated, which signifanctly reduces the spread of COVID-19.

## SECTION II: ALLOCATIONS AND PLAN INSTRUCTIONS

The QCARE planning allocations are based on a formula using census data as well as confirmed COVID cases by region. \$2,500,000 will be available to eligible and participating Community Action Agencies (CAA) for distribution for the period August 1, 2020 through December 31, 2020. If a CAA has received a notice of de-designation, they are not eligible for supplemental funding programs. In this case, the funding for the service area of a CAA in process of de-designation will be administered in that service area by an alternate CAA or other entity to be determined by BCAEO.

#### POLICY

Grantees shall prepare and submit QCARE documents in accordance with the guidelines below.

**Work/Service Plan** – Complete the plan for the period August 1, 2020 through December 31, 2020, in the EGrAMS system.

**Expenditure Plan** - Complete the expenditure plan for the period August 1, 2020 through December 31, 2020 in the EGrAMS system.

# The administrative expense limit for this program is 10% of the grantee's allocation.

**Logic Models** – Logic Models are not required for this program.



# SUBMITTAL PROCESS

Grantees are to submit the Service Plan documents through EGrAMS. See detailed instructions in SharePoint. If you are not able to access the documents in SharePoint, please reach out to <u>MDHHS-BCAEO@michigan.gov</u> for assistance. Technical questions for EGrAMS should be sent to <u>MDHHS-EGrAMS-Help@michigan.gov</u>.

## SECTION III: REPORTING

The Coronavirus Relief Funds (CRF) were allocated to states as a part of the CARES Act passed earlier this year. BCAEO is expecting additional inquiries regarding spending and how the funds are utilized by the network by upper MDHHS. As such, additional reporting for CRF programs is required. and the CAA must be able to report, at any given time:

- a. The number and type of QCARES Kits distributed.
- b. Spending projections

## **FACSPro**

Intake is waived for the QCARES program, so demographic information is not required. Mass entry should be completed at least quarterly. A FACSPro System Program and statewide Action Plan template will be created and must be used for this program. The template will include SRV 5jj (Food Distribution [Food Bags/Boxes, Food Share program, Bags of Groceries]) and SRV 5nn (Kits/Boxes).

#### **MONTHLY REPORTS**

On the final business day of each month, CAA should email a general ledger showing MTD and YTD expenditures

This general ledger will be used to track current spending. BCAEO recognizes that monthly expenditures may not be finalized at this point and additional expenses may be added to the grant. The complete general ledger should be attached in EGrAMS when the FSR is submitted for the month.

- CAA should project expenditures for the remaining months of the grant
- CAA should also notify BCAEO if the agency will need additional funds or if the agency has funds to returned

In addition to the General Ledger, agencies shall supply the following information in the body of the email:

## QCARE:

- 1) Number of Qboxes distributed.
- 2) Number of Individuals/households to receive Qboxes



#### **SUBMISSIONS**

Submit an email with the general ledger attached and the QCARE information to the <u>MDHHS-BCAEO@michigan.gov</u> mailbox and to the QCARES Grant Manager, Alex Mehls, <u>mehlsa@michigan.gov</u>.

Agencies should use a subject line for the email "QCARE End of Month Reporting".

# SECTION IV: ELIGIBILITY GUIDELINES PROGRAM ELIGIBILITY

Eligible Clients are those that have tested positive for COVID-19 or are waiting for test results, those that are self-quarantining due to exposure to COVID-19, vulnerable individuals, seniors, home-bound, or immune compromised individuals. This program will allow them to stay at home and in isolation to mitigate the exposure of COVID-19 to themselves and others. In addition, Community Action Agencies will work collaboratively with other low-income populations such as the migrant workers testing positive with COVID-19 with assistance in providing Q-CARES Kit Assistance. Referrals have also been incorporated into MiBridges and through 211.

## **INCOME ELIGIBILITY DETERMINATION**

Use the 200% of poverty income guidelines to determine eligibility for services provided with CRF funds. Income refers to total cash receipts (gross) before taxes from all sources (see Income Inclusions/Exclusions in CSPM 500 Series) for all household members.

#### Income computations

An applicant's household's gross income for the **preceding 30 days**, including the date of application must be annualized and evaluated.

## **Documentation of income**

All income must be documented.

Note: A self-declaration of the applicant may be used. The intake worker should record the steps taken that will demonstrate a reasonable effort was made to obtain income documents. BCAEO Grant Manager approvals are waived for zero income self-declarations and notary signatures are waived during the COVID-19 pandemic relief efforts.

The Bureau of Community Action and Economic Opportunity (BCAEO) will provide the local Health Departments and CAAs with an application to be completed by the customer, local health department, the CAA, and/or medical professional to determine eligibility for a quarantine box (Q-Box) that will provide essential household items and/or food to a person at or below 200% of the Federal Poverty Level that has tested positive for COVID-19. Community Action Agencies will also assist people that are waiting for test results, vulnerable, seniors, home bound, or immune compromised to



allow them to stay at home and in isolation to mitigate the exposure of COVID-19 to themselves and others. In addition, Community Action Agencies will work collaboratively with other low-income populations such as the migrant workers testing positive with COVID-19 with assistance in providing Q-CARES Kit Assistance. Referrals have also been incorporated into MiBridges and through 211.

#### Client signatures options during the COVID-19 pandemic relief efforts

- Video chatting (FaceTime, Skype, etc.)/electronic signature software
- Email/Voicemail
- Mail the form(s)
- CAA staff can document their phone conversation

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.

## Automatic eligibility for emergency services

CAAs may use the following:

- Self-declarations or affidavits of eligibility.
- 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 in the statewide system.

## **SECTION V: FUNDING**

Reallocations may take place at any time depending on the needs for a region and overall program demand.

Any Community Action Agencies that have received a notice of de-designation are not eligible for supplemental funding programs. In this case, the funding for the service area of a CAA in process of de-designation will be administered in that service area by an alternate CAA or other entity to be determined by BCAEO.



EFFECTIVE DATE

AUGUST 1, 2020 OCTOBER 19, 2020

# REFERENCES

• Water and Plumbing Repair CRF Grant Agreement

# SECTION I: BACKGROUND

## PURPOSE

Provide water repairs to mitigate the spread of COVID-19 by ensuring low-income households have access to water for washing and disinfecting surfaces. Frequent and thorough hand washing is among the most effective measures in restricting the spread of the virus because the primary routes of transmission are droplet and direct contact, according to the World Health Organization.

The program goal is that every eligible home will have access to hot and cold water and at least one functioning toilet, bathroom faucet, shower/bath, kitchen faucet, and laundry tub. It is also the program goal that the house has functioning wastewater drainage for water access to be sustainable in the home.

The Water Repair and Plumbing Assistance Program will assist customers based on a small assessment process to prioritize needs. Agencies are encouraged to prioritize the highest priority low-income, vulnerable, immune compromised individuals to be assisted first.

## **Urban Water Repair Program:**

*This is for clients that receive a water bill.* The allowable average job cost for interior work is \$5,200. Exterior plumbing work on the home is allowable and the job cost average for exterior work is \$9,000. The exterior work is allowable for any aspect of the water system that is the client's responsibility. The agency may submit a waiver to MDHHS-BCAEO@michigan.gov to address items that are not the client's responsibility if other paths to resolve the issue have been explored and the client's safe water access remains unresolved. Administrative costs are not included in the job cost.

## **Rural Water Repair Program:**

*This is for clients on a well/septic system.* The allowable average job cost for interior work is \$5,200. In addition to the typical water repair work, rural low-income households may have water plumbing repair needs that include well repair/replacements and septic tank/field repair/maintenance/replacement. The allowable average job cost for exterior rural repairs is \$9,000. Administrative costs are not included in the job cost.



# SECTION II: PROGRAM IMPLEMENTATION

Residents seeking emergency plumbing repair assistance will be able to apply for services at their local CAA. Intake staff will reach out to applicants and gather additional information about their plumbing situation. CAAs will create a list of priority points, based on the suggestions below and/or determined by identified local needs. With limited time for repairs, CAAs will serve residents with any of the identified plumbing/water issues that receive a priority point. Clients with any of the determined points are vulnerable amid the pandemic and may receive services. Agencies are encouraged to consider the client's level of need as determined by the priority points; however, any client with any displayed level of need may receive services at any time. The sample point list is below:

- 1. Do you have access to running water [No = 1]
- 2. Are you manually turning your water on and off at the main valve? [Yes = 1]
- 3. Do you have access to hot water? [No = 1]
- 4. Are you using a toilet in your home? [No = 1]
- 5. Are you able to take a shower or bath in your home? [No =1]
- 6. Are you able to wash your hands in your bathroom sink? [No = 1]
- 7. Can you use your laundry tub? [No = 1]
- 8. Are you able to use your kitchen sink to wash your dishes? [No = 1]
- Does wastewater regularly drain from your house? [No = 1]
- 10. Is your well currently functioning? [No = 1]
- 11. Is there necessary well treatment or maintenance that you have not had completed? [Yes = 1]
- 12. Is there necessary septic tank or field treatment or maintenance that you have not had completed? [Yes = 1]
- 13. Does your septic tank need to be pumped? [Yes = 1]

Agencies may customize this point list to meet the local area's plumbing/water repair need. Agencies are also encouraged to prioritize homes with children, seniors, vulnerable/immune compromised people or people with a disability.

Agencies with a waitlist are encouraged to utilize a prioritization assessment, where clients with no access to running water and a higher number of points are provided services first. Due to the quick turnaround of this program, it is possible that agencies do not have a waitlist. In this case, the agency may assist anyone with a point as defined above.

Staff schedule intake appointments with clients and collect 30 days of income to determine if households are at or below 200% of the Federal Poverty Level (based on CARES eligibility guidelines). See Section V: Eligibility Guidelines for more information.



After intake, plumbing/septic/well/HVAC contractors will conduct an assessment on the home and provide CAA staff with a list of necessary plumbing costs. At this stage, program approval is based on household plumbing repair costs and availability of funding. It is allowable for a partial work order to be completed, if it meets the stated program goal that every eligible home will have access to hot and cold water and at least one functioning toilet, shower/bath, kitchen faucet, and laundry tub. If the household is approved, the CAA will pay the plumbing/septic/well/HVAC contractors directly to conduct the necessary repairs.

CAAs are encouraged to build a roster of contractors through a Request for Proposal (RFP).

CAAs will have cost controls in place through a price list that all prospective contractors fill out as part of the RFP. The pricing list includes the most common installations, incidental materials needed for installations (i.e. screws, chalk, etc.) and standard hourly rates for each company's Master Plumber and Journeyman. Pricing is based on the total cost of labor and materials.

Alternatively, CAAs may bid out each job on an individual basis following rules outlined in 2 CFR 200. If agencies elect to use this option, they must adhere to contractual obligations, including the background checks of subcontractors. Please refer to the contract language for these requirements.

Payments must be made directly to contractors, and invoices must be retained and uploaded to FACSPro in the customer file. If the client has previously received a shut off notice from the water company based on a necessary repair and there is a fee associated with the restoration, then this program may cover the cost of that fee. Thorough documentation is necessary to discern that the payment covered such a fee from other components of a water bill.

# Statewide Funding Flexibility:

Since this program is time sensitive, BCAEO will monitor the progress made by the CAAs to ensure all funds provide the expected assistance in ensuring households have adequate and safe access to water. BCAEO will redistribute funds from one agency to another to meet program goals.

## **Deferral/Denial Policy:**

Clients who do not meet either the Home Eligibility or Client Eligibility criteria will be denied.

Potentially eligible clients will be sent to a plumber or appropriate contractor for an assessment.



The agency will make a final determination of eligibility based on the contractor's assessment of the client's home. If the client's home does not meet the program eligibility criteria upon assessment of the contractor, the client will be denied. Clients that meet the program eligibility criteria may still be deferred or denied.

Additionally, agencies may include additional reasons for client deferral/denial in their own program policy, including, but not limited to:

- Client failed to submit paperwork within 30 days
- Client did not return call(s)/ email(s) within 30 days of the first attempted point of contact.
- Client no longer has an emergency need (e.g. repairs were completed between application time and time of contact)
- Funding has been depleted
- Client has necessary work beyond the scope of the program
- A home may be deferred due to health & safety concerns (e.g. sewage, pests, lack of safe access to home/basement, etc.). If a plumbing/septic/well/HVAC contractor is not willing to complete the work needed due to a health/safety hazard, either: 1) another contractor will have to be sourced to complete the work or 2) the client will be determined ineligible until the health/safety hazard has been resolved.

# SECTION III: ALLOCATIONS AND PLAN INSTRUCTIONS

The Water and Plumbing repair planning allocations are based on a formula using census data as well as confirmed COVID cases by region. \$10,000,000 will be available to eligible and participating Community Action Agencies (CAA) for distribution for the period August 1, 2020 through December 30, 2020.

If a CAA has received a notice of de-designation, they are not eligible for supplemental funding programs. In this case, the funding for the service area of a CAA in process of de-designation will be administered in that service area by an alternate CAA or other entity to be determined by BCAEO.

## POLICY

Grantees shall prepare and submit Water and Plumbing Repair documents in accordance with the guidelines below.

**Work/Service Plan** – Complete the plan for the period August 1, 2020 through September 30, 2020 and October 1, 2020 through December 30, 2020, in the EGrAMS system.

**Expenditure Plan** - Complete the expenditure plan for the period August 1, 2020 through September 30, 2020 and October 1, 2020 through December 30, 2020 in the EGrAMS system.



The administrative expense limit for this program is 10% of the grantee's allocation. Administrative funds do not count toward the job cost average. Administrative expenses must be identified on the budget under Other Expense—Other-Administrative Costs.

Indirect cost rates are not allowable with CRF programs per the <u>US Department of</u> <u>Treasury</u> and may not be charged to the grant.

Please reach out to <u>MDHHS-BCAEO@michigan.gov</u> for assistance. Technical questions for EGrAMS should be sent to <u>MDHHS-EGrAMS-Help@michigan.gov</u>.

## SECTION IV: REPORTING

The Coronavirus Relief Funds (CRF) were allocated to states as a part of the CARES Act passed earlier this year. BCAEO is expecting additional inquiries regarding spending and how the funds are utilized by the network by upper MDHHS. As such, additional reporting for CRF programs is required.

#### Monthly Reports:

- **Due Date:** On the final business day of each month
- **Financial Report:** CAA should email a general ledger showing month to date (MTD) and year to date (YTD) expenditures

CAA should project expenditures for the remaining months of the grant

CAA should also notify BCAEO if the agency will need additional funds or if the agency has funds to returned

• **Submission:** Email to <u>MDHHS-BCAEO@michigan.gov</u> and the CRF Grant Manager Subject line for the email "CRFWA End of Month Reporting".

These end of month general ledger reports will be used to track current spending. BCAEO recognizes that monthly expenditures may not be finalized at this point and additional expenses may be added to the grant.

In addition to the General Ledger, agencies shall supply the following information in the body of the email:

- 1. Total number of households served, completed, or in-progress
- 2. Estimated projection of total spending for the entire program period (8/1/2020 12/30/2020)

At any time, BCAEO may request additional reporting and agencies should be able to report on these data points.



CAAs must utilize the FACSPro system for this program. Due to the importance of these funds, timely reporting is crucial. Information must be entered into FACSPro within one business day. Customer intake information must be entered in FACSPro, and the complete customer file must be uploaded to FACSPro. CAAs must record all payments to contractors in AwardPro within one business day of payment, and the complete invoice must be uploaded with the customer file. A statewide action plan template has been created, and customer action plans must be updated with completed Tasks, Services and Indicators within one business day of completion.

A FACSPro Guide with detailed instructions is available in the CRF Water and Plumbing Repair <u>SharePoint library</u>.

# SECTION V: ELIGIBILITY GUIDELINES

The CRF water and plumbing repair program eligibility is aligned with the eligibility for CSBG CARES. To be eligible for the CRF water and plumbing repair program, the household income must be at or below **200% of the federal poverty level**. Income refers to total cash receipts (gross) before taxes from all sources (see Income Inclusions/Exclusions in CSBG CARES – CSPM 800) for all household members.

# Client signatures options during the COVID-19 pandemic relief efforts

- Video chatting (FaceTime, Skype, etc.)/electronic signature software
- Email/Voicemail
- Mail the form(s)
- CAA staff can document their phone conversation

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.

## Income Eligibility

CAAs may determine income eligibility in one of two ways: Automatic eligibility or Income computations.

## Automatic eligibility for emergency services

CAAs may use the following:

• Self-declarations or affidavits of eligibility.



- Accepting eligibility certification paperwork from another Federal or State program as long as they do not exceed 200% of the Federal Poverty Level.
- Weatherization eligibility: if a customer is currently eligible for weatherization and on the agency's waitlist (or in another queue), the agency may use the eligibility determination for Weatherization as documentation of automatic eligibility for CRFWA services.

#### Income computations

An applicant's household's gross income for the **preceding 30 days**, including the date of application must be annualized and evaluated.

#### Documentation of income

All income must be documented in FACSPro.

If automatic eligibility is utilized, the client self-declaration/affidavit or eligibility determination notice from another Federal or State program must be uploaded with the customer file.

If income computation is utilized, the income screens in FACSPro must be completed, and documentation of income must be retained in the client file.

Self-declaration of income or eligibility for another qualified State or Federal program may be used. The agency should demonstrate a reasonable effort to obtain income documents.

# CLIENT FILE

At minimum, the required items in the client file include:

- Client signature: See "Client signatures options during the COVID-19 pandemic relief efforts" section of this CSPM.
- Income documentation: See "Documentation of income" section of this CSPM.
- Identification: All clients must provide identification to receive services.
- Proof of residence at property: Clients must also provide documentation that shows they live at the property. This may be contained within the identification or provided separately.
- Invoice(s): Invoices for payment to contractors must be retained and included in the client file.
- Landlord Agreement (if applicable): CAAs will provide renters with a landlord agreement that their landlord must sign and return.

Pre and post photographs are required of all measures addressed under this program. Agencies are encouraged to utilize this method, at minimum, to verify work orders and completion. An agency may choose to keep job photographs on an agency system. The agency is responsible for supplying the photographs to BCAEO staff upon request and



in a timely manner. Agencies that do not wish to store their photographs on an agency system must upload photographs to the FACSPro client file.

## VERIFICATIONS

CAAs create their own internal policy on required verifications within the parameters of federal, state, and local policies. Verification requirements will vary from agency to agency. Appropriate verifications to support serving the client should also be retained in the client file.

# SECTION VI: FUNDING

Reallocations may take place at any time depending on the needs for a region and overall program demand. BCAEO reserves the right to re-allocate funds from participating agencies to ensure the maximum amount of assistances are completed statewide.

**Grant Payments FSR Processing:** Agencies will submit a FSR in EGrAMS for payment. The complete general ledger should be attached in EGrAMS when the FSR is submitted for the month.



EFFECTIVE DATE	AUGUST 1, 2020	
ISSUE DATE	October 19, 2020	

# REFERENCES

CRFMW Grant Agreement

# SECTION I: BACKGROUND

#### PURPOSE

The Community Action Agency (CAA) will be notified of COVID-19 positive camp residents by Michigan Department of Health and Human Services (MDHHS) Migrant Program Workers. CAA staff will contact camp residents who test positive and give them the option to receive a stipend of \$1,000 for two weeks of not working, providing the individual is willing to quarantine/isolate in appropriate housing to reduce the spread of COVID-19. This contact shall be completed in a supportive, culturally sensitive manner. The CAA shall assist with providing the camp resident support to basic needs which may include housing, meals, toiletries, and laundry services at no charge.

In consideration of receiving a payment of \$1,000, a COVID-19 positive camp resident will:

- a. Receive \$500 after the resident enters the quarantine/isolation housing and
- b. Receive \$500 after the resident is cleared to return to work and leaves quarantine/isolation housing.
- c. Remain in the quarantine/isolation housing for two full weeks or until such time as a medical professional clears the resident to return to work.
- d. Agree that leaving the quarantine/isolation housing prematurely will result in return of funds dispersed and forfeiture of the 2<sup>nd</sup> payment.
- e. Agree to cooperate with contact tracing efforts.
- f. Agree to further testing COVID-19 provided at no cost by the local health department or the federally qualified health center (FQHC).
- g. Agree to answer check-in calls and comply with the instructions for health assessment checks over the telephone.

If it has been verified by a MDHHS Migrant Program Worker that a resident has been diagnosed and remained in quarantine for two weeks or until released by a medical professional prior to the initial application, a full lump sum of \$1,000 may be issued.

# SECTION II: ALLOCATIONS AND PLAN INSTRUCTIONS

Through the CRFMW, a total of \$1,000,000 is allocated equally to five CAAs that have been identified as having service areas of high migrant and seasonal farmworker populations. It is the expectation that participating CAAs receive and process referrals from outside of their standard service area.



Funding will be available to eligible and participating CAAs for distribution for the period August 1, 2020 through December 30, 2020. Agreements for Fiscal Year 2021 will be issued separately.

# POLICY

Grantees shall prepare and submit CRFMW documents in accordance with the guidelines below.

**Work/Service Plan** – Complete the plan for the period August 1, 2020 through September 30, 2020 in the EGrAMS system. October 1, 2020 through December 30, 2020 will be in a separate agreement.

**Expenditure Plan** - Complete the expenditure plan for the period August 1, 2020 through September 30, 2020 in the EGrAMS system. October 1, 2020 through December 30, 2020 will be in a separate agreement.

The administrative expense limit for this program is 10% of the grantee's allocation. Administrative expenses must be identified on the budget under Other Expense—Other-Administrative Costs.

Indirect cost rates are not allowable with CRF programs per the <u>US Department of</u> <u>Treasury</u> and may not be charged to the grant.

Logic Models – Logic Models are not required for this program

## SUBMITTAL PROCESS

Grantees are to submit the Service Plan documents through EGrAMS. Technical questions for EGrAMS should be sent to <u>MDHHS-EGrAMS-Help@michigan.gov</u>.

Detailed instructions and recorded webinars for submissions and technical assistance may be found through the <u>EGrAMS Homepage</u> --> About EGrAMS --> Grantee: Standard Agreement (see below).





# SECTION III: REPORTING

The Coronavirus Relief Funds (CRF) were allocated to states as a part of the CARES Act passed earlier this year. BCAEO is expecting additional inquiries regarding spending and how the funds are utilized by the network by upper MDHHS. As such, additional reporting for CRF programs is required.

## Monthly Reports:

- **Due Date:** On the final business day of each month
- **Financial Report:** CAA should email a general ledger showing month to date (MTD) and year to date (YTD) expenditures

CAA should project expenditures for the remaining months of the grant

CAA should also notify BCAEO if the agency will need additional funds or if the agency has funds to returned

• **Submission:** Email to <u>MDHHS-BCAEO@michigan.gov</u> and the CRF Grant Manager Subject line for the email "CRFMW End of Month Reporting".

These end of month general ledger reports will be used to track current spending. BCAEO recognizes that monthly expenditures may not be finalized at this point and additional expenses may be added to the grant.

In addition to the General Ledger, agencies shall supply the following information in the body of the email:

- a. The number of unduplicated applications for camp residents received
- b. The number of camp residents who have completed their quarantine/isolation (received full payment) and the number of camp residents in quarantine/isolation (first payment)
- c. Number of camp residents that have completed the requirements of the program and cannot be located. A list of individuals must be maintained at the agency.

In addition, the CAA must be able to report, at any given time:

- a. The number of camp residents who have gone into quarantine/isolation.
- b. The number of camp residents who have completed their quarantine/isolation.
- c. Number of camp residents that have completed the requirements of the program and cannot be located
- d. Spending projections

A FACSPro System Program and statewide Action Plan template have been created and must be used for this program. The template will include SRV 70

(Mediation/Customer Advocacy Interventions) and FNPI 5z.7 – (Number of individuals who mitigated the spread of COVID-19).



# SECTION IV: ELIGIBILITY GUIDELINES

#### **PROGRAM ELIGIBILITY**

The CAA will be notified of COVID-19 positive camp residents by Michigan Department of Health and Human Services Migrant Program Workers through an application dedicated to this program.

## **Client signature options during the COVID-19 pandemic relief efforts**

- Video chatting (FaceTime, Skype, etc.)/electronic signature software
- Email/Voicemail
- Mail the form(s)
- CAA staff can document their phone conversation

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.

Benefits may be issued in whichever method best meets the need of the eligible resident. Multiple residents in the same household may simultaneously receive benefits.

## SECTION V: FUNDING

Reallocations may take place at any time depending on the needs for a region and overall program demand. Grantees will be required to periodically report on spend and the forecasted spend throughout the grant program.

All funds that have not been incurred by December 30, 2020 must be returned to that State of Michigan by January 30, 2021.

The Financial Status Report must be submitted with the Grant Closing Certification, Expenditure Location Report, and Outcome Metric Report by January 30, 2021.

**Grant Payments FSR Processing:** Agencies will submit a FSR in EGrAMS for payment. The complete general ledger should be attached in EGrAMS when the FSR is submitted for the month.

Any Community Action Agencies that have received a notice of de-designation are not eligible for supplemental funding programs. In this case, the funding for the service area of a CAA in process of de-designation will be administered in that service area by an alternate CAA or other entity to be determined by BCAEO.



EFFECTIVE DATE

SEPTEMBER 1, 2020 October 19, 2020

## REFERENCES

• Emergency Services CRF Grant Agreement

# SECTION I: BACKGROUND

## PURPOSE

The COVID-19 pandemic and the conditions in low-income communities are increasing at the Community Action Agencies. It is expected that CAAs will immediately address the consequences of increasing unemployment, economic disruption, social distancing, lack of supplies, isolation/quarantine impact, and harmful effects of the virus on vulnerable groups during the COVID-19 pandemic. CAAs have expanded their emergency services intake, delivery, and distribution activities using multiple technologies to reduce and limit face to face contact with clients, customers, guests, staff, partners, and volunteers.

Funds were awarded to the State of Michigan as Federal Financial Assistance from the U.S. Department of Treasury. The funds were awarded under the Social Security Act, as amended by section 5001 of the Coronavirus Aid, Relief, and Economic Security Act ("CARES Act") https://home.treasury.gov/policy-issues/cares/state-and-local-governments as the Coronavirus Relief Fund.

# SECTION II: PROGRAM IMPLEMENTATION

CAAs will meet community needs and assist low-income individuals and families by providing services including, but not limited to, the list below. CAAs will be expected to coordinate, not to supplant, funding with other partners, MDHHS local office, and other CRF funding.

Food Distribution Programs

- Food Distribution
- Home delivered meals
- Kitchen and meal preparation
- Food box packaging

Eviction Prevention Assistance & Homelessness Prevention Programs

- Mortgage Assistance
- Rental Assistance
- Property Tax Foreclosure
- Foreclosure Prevention



- Eviction Prevention
- Home Preservation
- Shelter Assistance
- Rapid Rehousing
- Housing Counseling
- Property tax arrearages
- Security deposit (if required)
- Monthly rent
- Lot rent
- Rent or mortgages arrearages
- Temporary shelter and/or Rapid Rehousing
- Hotel vouchers
- Pay as you Stay Program
- Home Preservation (including measures taken to prevent condemnation)
- Housing and/or Eviction Prevention counseling
- Landlord Mediation (when possible)

Housing Programs:

- Housing Assistance
- Emergency Shelter
- Minor home repair

Utility Assistance:

- Electrical, natural gas and deliverable fuel assistance
- Assistance in an affordable payment plan

Water Assistance:

- Assistance with water payment
- Reconnection
- Assistance in a payment plan

Transportation Assistance:

- Bus tokens
- Rides to medical/dental appointments/grocery stores
- Car repairs, car payments, insurance, gas vouchers

## SECTION III: ALLOCATIONS AND PLAN INSTRUCTIONS

\$3,000,000 will be available to eligible and participating Community Action Agencies (CAA) for distribution for the period August 1, 2020 through December 30, 2020.



# Statewide Funding Flexibility:

Since this program is time sensitive, BCAEO will monitor the progress made by the CAAs to ensure all funds provide the expected assistance in ensuring households have adequate and safe access to water. BCAEO will redistribute funds from one agency to another to meet program goals.

#### POLICY

Grantees shall prepare and submit Emergency Services documents in accordance with the guidelines below.

**Work/Service Plan** – Complete the plan for the period August 1, 2020 through September 30, 2020 and October 1, 2020 through December 30, 2020, in the EGrAMS system.

**Expenditure Plan** - Complete the expenditure plan for the period August 1, 2020 through September 30, 2020 and October 1, 2020 through December 30, 2020 in the EGrAMS system.

The administrative expense limit for this program is 10% of the grantee's allocation. Administrative costs must be entered into the EGrAMS budget under "Other expense--Other-Administrative Costs".

Indirect costs rates are not allowable for CRF programs.

Please reach out to <u>MDHHS-BCAEO@michigan.gov</u> for assistance. Technical questions for EGrAMS should be sent to <u>MDHHS-EGrAMS-Help@michigan.gov</u>.

## SECTION IV: REPORTING

CAAs must utilize the FACSPro system for this program.

The Coronavirus Relief Funds (CRF) were allocated to states as a part of the CARES Act passed earlier this year. BCAEO is expecting additional inquiries regarding spending and how the funds are utilized by the network by upper MDHHS. As such, additional reporting for CRF programs is required.

#### Monthly Reports:

- **Due Date:** On the final business day of each month
- **Financial Report:** CAA should email a general ledger showing month to date (MTD) and year to date (YTD) expenditures

CAA should project expenditures for the remaining months of the grant



CAA should also notify BCAEO if the agency will need additional funds or if the agency has funds to returned

• **Submission:** Email to MDHHS-BCAEO@michigan.gov and copy the CRF Grant Manager. Subject line for the email "CRFES End of Month Reporting".

These end of month general ledger reports will be used to track current spending. BCAEO recognizes that monthly expenditures may not be finalized at this point and additional expenses may be added to the grant.

In addition to the General Ledger, agencies shall supply the following information in the body of the email:

1) Number of households assisted

2) Estimated projection of total spending for the entire program period (8/1/2020 – 12/30/2020)

At any time, BCAEO may request additional reporting and agencies should be able to report on these data points.

# SECTION V: ELIGIBILITY GUIDELINES

The CRF Emergency Services program eligibility is aligned with the eligibility for CSBG CARES. To be eligible for the CRF Emergency Services Program, the household income must be at or below **200% of the federal poverty level**. Income refers to total cash receipts (gross) before taxes from all sources (see Income Inclusions/Exclusions in CSBG CARES – CSPM 800) for all household members.

All clients must provide identification to receive services.

## **Client signatures options during the COVID-19 pandemic relief efforts**

- Video chatting (FaceTime, Skype, etc.)/electronic signature software
- Email/Voicemail
- Mail the form(s)
- CAA staff can document their phone conversation

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.



#### Income Eligibility

CAAs may determine income eligibility in one of two ways: Automatic eligibility or Income computations.

#### Automatic eligibility for emergency services

CAAs may use the following:

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

#### Income computations

An applicant's household's gross income for the **preceding 30 days**, including the date of application must be annualized and evaluated.

#### **Documentation of income**

All income must be documented in FACSPro.

If automatic eligibility is utilized, the client self-declaration/affidavit or eligibility determination notice from another Federal or State program must be retained in the client file.

If income computation is utilized, the income screens in FACSPro must be completed, and documentation of income must be retained in the client file.

Self-declaration of income or eligibility for another qualified State or Federal program may be used. The agency should demonstrate a reasonable effort to obtain income documents.

#### VERIFICATIONS

CAAs create their own internal policy on required verifications within the parameters of federal, state, and local policies. Verification requirements will vary from agency to agency.

#### SECTION VI: FUNDING

Reallocations may take place at any time depending on the needs for a region and overall program demand. Grantees will be required to periodically report on spend and the forecasted spend throughout the grant program.



All funds that have not been incurred by December 30, 2020 must be returned to that State of Michigan by January 30, 2021.

The Financial Status Report must be submitted with the Grant Closing Certification, Expenditure Location Report, and Outcome Metric Report by January 30, 2021.

**Grant Payments FSR Processing:** Agencies will submit a FSR in EGrAMS for payment. The complete general ledger should be attached in EGrAMS when the FSR is submitted for the month.

Any Community Action Agencies that have received a notice of de-designation are not eligible for supplemental funding programs. In this case, the funding for the service area of a CAA in process of de-designation will be administered in that service area by an alternate CAA or other entity to be determined by BCAEO.



EFFECTIVE DATE

OCTOBER 1, 2020 OCTOBER 19, 2020

## REFERENCES

• Digital Divide CRF Grant Agreement

# SECTION I: BACKGROUND

#### PURPOSE

The COVID-19 pandemic has led to a new reliance on digital infrastructure and connectivity. During the beginning stages of the coronavirus, people with computers and fast, broadband internet connections could transition swiftly to a shelter-in-place lifestyle. Those without, couldn't. In Michigan, low-income communities had a higher number of COVID-19 positive cases.

According to the Census Bureau, three out of every four Americans who lack broadband access have the infrastructure in their neighborhood but haven't connected to it. While service is available in urban areas, rural areas experience spotty to no internet service due to a lack of broadband.

Until a broader solution to ensuring all people including low-income has access to high speed broadband internet connections and with the coronavirus showing no signs of slow down, the Digital Divide Assistance program is needed for low-income households to mitigate the spread of COVID-19 while participating in new innovations coming out of the pandemic including online education for head start to college students, telemedical services, Mi Bridges assistance for services, remote working opportunities, food assistance, eviction prevention court processing, and other basic needs.

The Digital Divide Assistance funding will help provide laptop/tablets and internet connections and other technologies to keep low-income households safe in their homes and to reduce the spread of COVID-19 while access basic needs, services, educational opportunities, State Executive Orders, and health care providers with a "Household Functioning Device".

Funds were awarded to the State of Michigan as Federal Financial Assistance from the U.S. Department of Treasury. The funds were awarded under the Social Security Act, as amended by section 5001 of the Coronavirus Aid, Relief, and Economic Security Act ("CARES Act") https://home.treasury.gov/policy-issues/cares/state-and-local-governments as the Coronavirus Relief Fund.



# SECTION II: PROGRAM IMPLEMENTATION

Funds will be granted to eligible Community Action Agencies to provide technology devices and an annual subscription to local internet connections for low-income individuals and families that are at or below 200% of the federal poverty level. CAAs will recruit participants who are active in CAA programs and working toward self-sufficiency.

Some eligible low-income individuals and families may not be able to participate in the program due to the systemic problem of spotty to no broadband access. CAAs will be encouraged to try other solutions such as hotspots, satellite services, or other options.

CAAs will provide a capable broadband-enabled device, such as a laptop or tablet, and a twelve-month broadband internet plan. In areas where broadband connectivity is sparse, other technologies and services such as cellular may be provided based on the Community Action Agency Digital Divide Plan. Funding may also be utilized to provide ongoing technical support to clients to ensure households are able to successfully utilize the equipment they receive.

The immediate and main focus for the Digital Divide Assistance program is to mitigate the spread of COVID-19 in Michigan by reducing the need for low-income individuals and families to leave their homes for basic needs. Access to technology and broadband provide households to meet their needs at home.

If the household relocates and loses their subscription within the 12 months, the CAA may use the credit received from the provider for alternate households if received by December 30, 2020. If the credit is received December 31, 2020 or later, it must be returned to the state of Michigan.

CAAs are also encouraged to collect information on the household technology infrastructure, devices, costs, and digital literacy.

## SECTION III: ALLOCATIONS AND PLAN INSTRUCTIONS

\$5,000,000 will be available to eligible and participating Community Action Agencies (CAA) for distribution for the period October 1, 2020 through December 30, 2020.

## Statewide Funding Flexibility:

Since this program is time sensitive, BCAEO will monitor the progress made by the CAAs to ensure all funds provide the expected assistance of a device and/or access to high speed broadband. BCAEO will redistribute funds from one agency to another to meet program goals.



## POLICY

Grantees shall prepare and submit Digital Divide documents in accordance with the guidelines below.

**Work/Service Plan** – Complete the plan for the period October 1, 2020 through December 30, 2020, in the EGrAMS system.

**Expenditure Plan** - Complete the expenditure plan for the period October 1, 2020 through December 30, 2020 in the EGrAMS system.

The administrative expense limit for this program is 10% of the grantee's allocation. Administrative costs must be entered into the EGrAMS budget under "Other expense--Other-Administrative Costs". Indirect costs rates are not allowable for CRF programs.

Please reach out to <u>MDHHS-BCAEO@michigan.gov</u> for program assistance. Technical questions for EGrAMS should be sent to <u>MDHHS-EGrAMS-Help@michigan.gov</u>.

## SECTION IV: REPORTING

CAAs must utilize the FACSPro system for this program.

The Coronavirus Relief Funds (CRF) were allocated to states as a part of the CARES Act passed earlier this year. BCAEO is expecting additional inquiries regarding spending and how the funds are utilized by the network by upper MDHHS. As such, additional reporting for CRF programs is required.

## Monthly Reports:

- **Due Date:** On the final business day of each month
- **Financial Report:** CAA should email a general ledger showing month to date (MTD) and year to date (YTD) expenditures

CAA should project expenditures for the remaining months of the grant

CAA should also notify BCAEO if the agency will need additional funds or if the agency has funds to returned

• **Submission:** Email to <u>MDHHS-BCAEO@michigan.gov</u> and the CRF Grant Manager Subject line for the email "CRFDD End of Month Reporting".

These end of month general ledger reports will be used to track current spending. BCAEO recognizes that monthly expenditures may not be finalized at this point and additional expenses may be added to the grant.



# In addition to the General Ledger, agencies shall supply the following information in the body of the email:

1) Number of devices distributed for the month. If possible, a breakdown of the type of device (laptop/tablet/smartphone) should be included.

2) Number/type of annual subscriptions paid for during the month.

3) Other milestones based on the specific services provided.

At any time, the CAA may be asked to provide an update on program progress.

**Grant Payments FSR Processing:** Agencies will submit a FSR in EGrAMS for payment. The complete general ledger should be attached in EGrAMS when the FSR is submitted for the month.

**CAAs must provide a 1 to 2-year Digital Divide Plan** to ensure the technology gap for low-income households is reduced. It will vary from one Community Action Agency to another based on need, capacity, and time. The plan should include the following:

- processes to ensure eligible clients participate in self-sufficiency plans, monthly check-ins, and other wrap around services by utilizing the technology and devices provided with this funding.
- online training links, guides, and/or other opportunities on using the technology and devices to obtain services and meeting emergency needs while staying home and/or in isolation to mitigate the exposure of COVID-19 to themselves and others.
- a strategy to provide a device and 12-months of high-speed broadband.

# SECTION V: ELIGIBILITY GUIDELINES

Low-income individuals and families at or below 200% of the Federal Poverty Level are eligible for this program. CAAs are encouraged to target individuals/families from the following:

- that tested positive for COVID-19, immune compromised/vulnerable, or quarantined/isolated/exposed
- that have or will develop a 12-month self-sufficiency plan with monthly check-ins; or
- that are an active participant in CAA or partner's programs, examples including but not limited to: Early Head Start, Head Start, GED, Budget/Financial Literacy programs, job placement, Michigan Works, Michigan Virtual Online School, Health Departments, or other programs 200% of the federal poverty level.



## **Client signatures options during the COVID-19 pandemic relief efforts**

- Video chatting (FaceTime, Skype, etc.)/electronic signature software
- Email/Voicemail
- Mail the form(s)
- CAA staff can document their phone conversation

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.

#### Income Eligibility

CAAs may determine income eligibility in one of two ways: Automatic eligibility or Income computations.

#### Automatic eligibility for emergency services

CAAs may use the following:

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

#### Income computations

An applicant's household's gross income for the **preceding 30 days**, including the date of application must be annualized and evaluated.

#### **Documentation of income**

All income must be documented in FACSPro.

If automatic eligibility is utilized, the client self-declaration/affidavit or eligibility determination notice from another Federal or State program must be retained in the client file.

If income computation is utilized, the income screens in FACSPro must be completed, and documentation of income must be retained in the client file.



Self-declaration of income or eligibility for another qualified State or Federal program may be used. The agency should demonstrate a reasonable effort to obtain income documents.

#### VERIFICATIONS

CAAs create their own internal policy on required verifications within the parameters of federal, state, and local policies. Verification requirements will vary from agency to agency.

## SECTION VI: FUNDING

Reallocations may take place at any time depending on the needs for a region and overall program demand. Grantees will be required to periodically report on spend and the forecasted spend throughout the grant program.

All funds that have not been incurred by December 30, 2020 must be returned to that State of Michigan by January 30, 2021.

The Financial Status Report must be submitted with the Grant Closing Certification, Expenditure Location Report, and Outcome Metric Report by January 30, 2021.

Any Community Action Agencies that have received a notice of de-designation are not eligible for supplemental funding programs. In this case, the funding for the service area of a CAA in process of de-designation will be administered in that service area by an alternate CAA or other entity to be determined by BCAEO.



EFFECTIVE DATE
ISSUE DATE

OCTOBER 1, 2021 February 28, 2023

#### REFERENCES

- LIHWAP State Plan
- CSPM 900
- LIHWAP FACSPro Guide

# **SECTION I: BACKGROUND**

#### PURPOSE

To create a residential utility relief program to provide direct payment assistance for water and wastewater arrearages designed to help households retain water service to help mitigate the spread of COVID-19.

Community Action Service Plans must adhere to the following state laws:

## COMPLIANCE WITH STATE RULES AND REGULATIONS

To comply with the Michigan Economic and Social Opportunity Act of 1981 (<u>Act 230 of 1981</u> and as amended <u>Act 123 of 2003</u>) and the associated <u>Administrative Rules</u> with the Act.

Under the supervision of the MDHHS, the bureau shall serve as a statewide advocate for social and economic opportunities for low-income persons and shall:

- (a) Coordinate state activities designed to reduce poverty and implement community social and economic programs.
- (b) Cooperate with agencies of the state and federal government and other public agencies, nonprofit private agencies, and nonprofit organizations in reducing poverty and implementing community social and economic programs.

## COMMUNITY SERVICES POLICY MANUAL (CSPM)

To comply with Bureau of Community Action and Economic Opportunity's (BCAEO) Community Services Policy Manual (CSPM) pertaining to the Community Services Block Grant Program, LIHWAP Service Plans are to be developed using a process that assess poverty-related needs, available resources, feasible goals and strategies, and that yield program priorities consistent with standards of effectiveness established for the LIHWAP program. The LIHWAP Service Plan should identify eligible activities to be funded in the program service areas and the needs that each activity is designed to meet.

## SECTION II: ALLOWABLE AND UNALLOWABLE SERVICES

Assistance to households may include the following:



- Direct payment assistance for water and wastewater arrearages.
- The maximum payment amount, or household cap, is \$1,500 per fiscal year per household (including any fees needed for reconnection). The fiscal year cap applies to all types of LIHWAP assistance.
  - CAAs may submit waiver requests to the cap to <u>MDHHS-LIHWAP@michigan.gov</u> with the subject line "LIHWAP Waiver Request (Client Last Name). The waiver request template is located in <u>SharePoint</u> or can be requested through <u>MDHHS-LIHWAP@michigan.gov</u>. Waiver requests must be completed in full prior to approval.
  - In areas where water providers are disconnecting residential accounts, BCAEO may approve exceptions to the cap, and CAAs should encourage households to apply for SER.
  - In areas where water providers are not disconnecting residential accounts, BCAEO may approve exceptions to the cap up to \$3,000 per fiscal year per household if the household has one of the following members: an individual aged 60 years or older, a child aged 5 years or under, or an individual with a disability.
- Reconnection fees when services have been disconnected (up to the fiscal year cap).
- Instances where utility payments are included in the customer's rental payment, renters
  may qualify for LIHWAP benefits provided they can show proof that the water and/or
  wastewater utilities are included in their rent and the amount past due has led to
  disconnection status or imminent disconnection. To qualify, the applicant must submit a
  water/ wastewater bill that shows that they are in jeopardy of being disconnected or have
  already been disconnected. The applicant may use their lease or a statement from the
  landlord to verify the water and wastewater utilities are included in their rent.
- In instances where an arrearage does not match the customer's current address, the arrearage may be paid if the bill, including old or transferred balances, must be paid to start or maintain service at the current or new address.

Assistance to households **may not** include the following:

- Any services other than water and wastewater arrears or reconnections.
- Payments that result in a credit to a household account will result in recoupment of funds during monitoring.
- Any assistance above the \$1,500.00 per fiscal year per household unless a waiver request has been approved by BCAEO.

# SECTION III: ALLOCATIONS AND PLAN INSTRUCTIONS

The FY2021 LIHWAP planning allocations are based on the formula used for the Community Services Block Grant funding. Approximately \$35,000,000 will be available to the CAA network for distribution for the period on or around October 1, 2021 through September 30, 2023. Final allocations will be adjusted once funding is appropriated and may be reallocated.

# POLICY

CAAs shall prepare and submit an FY2022 LIHWAP Service Plan in accordance with the guidelines below.



**Service Plan** – Complete the plan for the period October 1, 2021, through September 30, 2023, using the Application and Instructions.

**Expenditure Plan** - Complete the expenditure plan for the period October 1, 2021, through September 30, 2023, using the Excel sheet in SharePoint.

#### The administrative expense limit is 15%.

It is expected that the CAAs immediately begin to engage with a communication strategy to reach low-income, vulnerable, and unemployed people impacted by the COVID-19 pandemic to provide water assistance.

**Logic Models** – Complete your logic models for the LIHWAP funding in FACSPro.

- Send Action Plan Template requests to the FACSPro helpdesk
- Logic Models must be completed in FACSPro.

#### SUBMITTAL PROCESS

Grantees are to submit the Service Plan documents through SharePoint. See detailed instructions in <u>SharePoint</u>.

Questions regarding the LIHWAP Service Plan should be directed to your grant manager.

## SECTION IV: ELIGIBILITY GUIDELINES

#### INCOME ELIGIBILITY

Income eligibility can be determined in one of two ways, through categorical eligibility or an income computation. See the FACSPro Guide in <u>SharePoint</u> for additional guidance on entering income eligibility information and documentation in FACSPro.

#### Categorical Eligibility

A residential water and/or wastewater service customer who currently receives one or more of the following benefits can be determined categorically eligible:

- Temporary Assistance for Needy Families
- Supplemental Security Income
- State Emergency Relief
- Food Assistance Program/Supplemental Nutrition Assistance Program

Supporting documentation showing the customer is a current beneficiary must be stored in the client file. The MDHHS case number must also be entered when an MDHHS program is used for categorical eligibility. Income sources are not required to be entered in FACSPro for categorically eligible households.

#### Income Computation

If a residential water and/or wastewater service customer is not categorically eligible, an income computation must be performed. Use the 150% of poverty income guidelines to



determine eligibility for services provided with LIHWAP funds. Income refers to total cash receipts (gross) before taxes from all sources) for all household members (see Income Inclusions/Exclusions below).

An applicant's household's gross income for the preceding 30 days, including the date of application must be computed in FACSPro or an alternate system approved by BCAEO to be annualized. Income computations must be performed in FACSPro, and all income sources must be entered in FACSPro.

Household/Family Size	150% Federal Poverty Level Guidelines (Monthly)			
1	\$21,870			
2	\$29,580			
3	\$37,290			
4	\$45,000			
5	\$52,710			
6	\$60,420			
7	\$68,130			
8	\$75,840			

For families/households with more than 8 persons, add \$5,140 for each additional person.

Note: FACSPro will automatically include and exclude income sources in compliance with the Inclusions/Exclusions below.

For zero income households, Grantees must make a reasonable effort to obtain documentation of income and document that effort in the client file. If no documentation can be obtained after a reasonable effort is made, A self-declaration of zero income the applicant may be used as a last resort.

BCAEO Grant Manager approvals and notary signatures are waived for zero-income selfdeclarations for LIHWAP funding.

## Migrant Income Computation and Self-Declarations of Income

Due to the nature and frequent changes in employment of Migrants, self-declarations of income may be used as a last resort after all other options have been exhausted. Self-declared income must be annualized and entered as one lump sum in FACSPro. The client file should include notes of why the self-declaration was used by Grantee staff. The annualized income must adhere to LIHWAP Federal Poverty guidelines.



# DOCUMENTATION OF INCOME ELIGIBILITY

All support documentation for income eligibility determinations must be uploaded to FACSPro or an alternate system pre-approved by BCAEO.

#### IDENTIFICATION

The chart below includes the types of identification required at intake and in the client file.

	Collected from Whom		
Type of Identification Collected	Applicant Only	All Adults in Household	All Household Members
Social Security Card is photocopied and retained	Requested	Requested	Requested
Social Security Number (Without Actual Card)	Requested	Requested	Requested
Government-issued identification card (i.e.: driver's license, State ID, Tribal ID, passport, etc.)	Requested	Requested	Requested

## CITIZENSHIP

The following methods may be used to verify citizenship requirements:

- Applicants sign an attestation of citizenship or legal residency
- Applicant's submission of Social Security cards is accepted as proof of legal residency
- Noncitizens must provide documentation of immigration status

# ASSETS

Asset Testing is waived for LIHWAP Funding administered by Community Action Agencies.

## CLIENT SIGNATURES

- 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.
- 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 <u>SharePoint</u>.

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.

## HOUSEHOLD COMPOSITION

Income from all household members is used to determine income eligibility. A household is all persons occupying a housing unit, regardless of whether they are related.

**Exception:** For income eligibility purposes, Foster Children are not to be included as household members and Foster Care payments/subsidies are not to be included as income.

#### **Absent Household Members**

Household members who are absent from the home for 90 consecutive days or more are excluded from the household and therefore, their income is excluded.

#### Roomers

For applicants/households that have "roomers" paying rent, the "roomer" is not considered a member of the "household" and the income of the "roomer" is not counted for income eligibility. However, the rent from the roomer should be included as income. When annualizing income, the income from rent payments should only be included for the months that rent was received.

For applicants/households that are "roomers" paying rent, only the income of the "roomer" is counted for income eligibility (the income of the home owner/principle renter is not counted).



Documentation of "roomer" status must be provided including:

- 1. A statement from the home owner/principle renter that the applicant is a "roomer" and is paying monthly rent in the amount of \$\_\_\_\_.
- 2. A copy of a canceled check or monthly bank statement showing the check amount and the payee.
- **3.** If the payment transaction was in cash, or a canceled check or monthly bank statement is not available, ask the applicant to get a written receipt from the homeowner for the last month's rent paid (this could be incorporated in #1 above if necessary).

# INCOME INCLUSIONS/EXCLUSIONS

**Income Includes** (there are no stipulations on spending)

- 1. Gross wages/earnings and salaries before any deductions.
- 2. Self-employment/net receipts from nonfarm or farm self-employment: receipts from a person's own business or from an owned or rented farm after deductions for business or farm expenses. (See Self-Employment Income below)
- 3. Social Security (Retirement, Survivor's, Dependent's, and Disability Insurance Income) gross benefits, including any Medicare premium from the Social Security Administration\*.
- Kailroad Retirement payments\*.
- 5. Supplemental Security Income (SSI)\*.

\*Note: Retroactive lump sum payments for Supplemental Security Income (SSI), Social Security Insurance or Railroad Retirement Benefits should be prorated on a 12-month basis so that only benefits covering the three-month calculation period are included.

- 6. State SSI Supplemental Payment. (e.g., State SSI quarterly payment).
- 7. Worker's compensation, and/or private long-term or short-term disability payments.
- 8. Veteran's Payments: VA Service Connected Disability Compensation; VA Non-Service Connected Disability Pension; Military Retirement Pay, and Military Family Allotments.
- Temporary Assistance for Needy Families TANF, Family Independence Program-FIP (Cash Assistance Title IV) and State Disability Assistance (SDA).
- 10. Àdoption Subsidies and Independent Living Stipends (if there are no restrictions on use).
- 11. Training stipends.
- 12. Court-ordered Child Support and Alimony or Spousal Support.
- 13. Private Pensions, Government Employee Pensions, and other Retirement income.
- 14. Insurance or annuity payments.
- 15. Income from Individual Retirement Accounts (IRAs) received during the computation period, whether received as monthly or in a lump-sum withdrawal.

Note: Lump-Sum IRA withdrawals should be prorated on a 12-month basis and the three months of prorated amount should be included in the computation.

- 16. Income from Dividends, Interest, Stocks or Bonds.
- 17. Periodic receipts from Estates or Trusts.
- 18. Net Rental Income, including from Roomers.
- 19. Net Royalties; Net Gambling/Casino, or Lottery winnings.
- 20. Tribal Payments Any payments received by Native Americans, such as from Casino income or other Tribal income.



- 21. Joint Income received by more than one individual. Divide the income equally among recipients.
- 22. Third party benefits paid directly to a company for a client's housing or bills. Third party benefits are only counted as income if they are paid to a company or entity in lieu of paying an individual Child Support, Alimony, or wages directly.

## Lump Sum Payments

Note: Retroactive lump sum payments for Social Security, SSI, Railroad Retirement Benefits and Lump-sum IRA withdrawals should be prorated on a 12-month basis so that only benefits covering the 30 day calculation period are included.

**Income Excludes** (includes examples that are limited in what the income can be spent on.)

- 1. Emergency assistance program payments
- 2. Tax Refunds or Earned Income Tax Credit.
- 3. Gifts or Loans (including but not limited to Reverse Mortgages).
- 4. Lump-Sum Inheritances.
- 5. Compensation for Injury or One-time Insurance Payments.
- 6. Non-cash benefits such as employer paid or union paid portion of health insurance or other employee fringe benefits
- 7. Food or housing received in lieu of wages/earnings (in-kind).
- 8. The value of food and fuel produced and consumed on farms or the imputed value of rent from owner-occupied non-farm or farm housing.
- 9. State/Federal Non-Cash Benefit programs such as: Medicare (Medicare premiums payments are **not** excluded), Medicaid, SNAP/Food Assistance Program benefits (including cash received in lieu of food stamps), school lunches, housing assistance, childcare vouchers (Child Development and Care payments made on the behalf of MDHHS customers), Women Infant and Child Supplemental Nutrition Program (WIC), Temporary Assistance for Needy Families (TANF), or Affordable Care Act Subsidies.
- 10. College Scholarships (including work study), Grants, Student Stipends, Fellowships and Assistantships, VA Education Benefits (GI Bill). 11.Foster Care Payments, including Foster Grandparent Payments, Family Support
- Subsidies, and Guardianship Assistance Payments.
- 12. Combat Zone Pay to the Military.
- 13. Student Income Income earned through employment by a child age 18 and under, and attending high school.
- 14. Any assets resulting from withdrawals from a bank; or the sale of property, a house or a car, including capital gains.
- 15. Unemployment income
- 16. Covid-19 Economic Impact Payments (Stimulus Checks)

**NOTE:** "Earnings" do not include program benefits such as Social Security, Supplemental Income (SSI), etc.; these are included in the total household income.

#### Self-Employment Income

Self-employment income must be documented for each type of self-employment activity or business. Business expenses may be deducted from the gross income amount determined for each self-employment activity/business. Documentation of claimed expenses must be included in the client file information.



#### CSPM 1406 LOW INCOME HOUSEHOLD WATER ASSISTANCE PROGRAM (LIHWAP) Policy

NOTE: Losses from a single self-employment source of income cannot be applied to any other self-employment income or other household income types. In other words, if self-employment business A realizes a loss of \$10,000, the income from that source is considered zero. The \$10,000 loss cannot be deducted from self-employment business B or other household income.

## Self-Employment Expenses

Allowable expenses (deduct from income):

- Identifiable expenses of labor, stock, raw material, seed, fertilizer, etc.
- Interest and principal on loans for equipment, real estate or income-producing property.
- Insurance premiums on loans for equipment, real estate and other income-producing property.
- Taxes paid on income-producing property.
- Transportation costs while on the job (example: fuel).
- Purchase of capital equipment.
- A child care provider's cost of meals for children. Do not allow costs for the provider's own children.
- Any other identifiable expense of producing self-employment income except those listed below.

Unallowable expenses (not deducted from income):

- A net loss from a previous period.
- A net loss from another type of self-employment.
- Federal, state and local income taxes.
- Personal entertainment or other individual business expenses.
- Money set aside for retirement.
- Depreciation on equipment, real estate or other capital investments.

## **SECTION V: REPORTING**

Grantees must report information in real time in FACSPro (or an alternate, pre-approved system), including demographics, Action Plans, and Awards. BCAEO staff must be able to generate real-time reports from FACSPro, or an alternate pre-approved system, on the following information at minimum:

- The number of households assisted
- The average benefit amount provided
- The number of households whose water or wastewater services were restored because of the benefit,
- The number of imminent disconnections of water or wastewater services avoided because of the benefit
- The number of households with members age 60+
- The number of households with disabled individuals
- The number of households with children



#### SECTION VI: OTHER

#### CLIENT FILE

Grantees must maintain a client file for all recipients of LIHWAP services in FACSPro or an alternate system pre-approved by BCAEO (See CSPM Item 909 and the LIHWAP FACSPro Guide).

Documentation of collateral contact with the water or wastewater provider may be included in lieu of requesting a copy of the actual bill.

A copy of a lease or rental agreement may be required for renters to verify obligation.

#### VENDOR AGREEMENTS

All water/wastewater providers must have a signed vendor agreement on file prior to receiving payment on behalf of an account holder. One agreement per provider per CAA is required. A copy of the vendor agreement may be found in SharePoint or by contacting <u>MDHHS-LIHWAP@michigan.gov</u>.

#### PROGRAM OUTREACH

It is the expectation that Community Action Agencies work with water and wastewater providers as well as other community partners in their service area to provide outreach services for LIHWAP. Examples of outreach services may include:

- Flyers for lobbies, food distribution boxes, mailers, account bills, etc.
- Mass texting
- Social media and website promotion
- Radio/television advertisement
- Wraparound services

#### FUNDING

Reallocations may take place at any time depending on the needs by region and overall program demand. Grantees will be required to periodically report on actual and forecasted throughout the grant program.

All funds that have not been incurred by December 30, 2023, must be returned to that State of Michigan by January 30, 2024.

Any Community Action Agencies that have received a notice of de-designation are not eligible for supplemental funding programs. In this case, the funding for the service area of a CAA in process of de-designation will be administered in that service area by an alternate CAA or other entity to be determined by BCAEO.



EFFECTIVE DATE

OCTOBER 1, 2024 SEPTEMBER 1, 2024

## REFERENCES

- <u>State of Michigan FY24 Budget Boilerplate, Section 464</u>
- <u>CFR 260.31</u>

## SECTION I: BACKGROUND

#### PURPOSE

Sec. 464. (1) From the funds appropriated in part 1 for diaper assistance grant, \$4,404,400.00 must be allocated as grants to diaper assistance programs, maternity homes, and other nonprofit agencies that distribute diapers free of charge and were established as of January 1, 2020. The funds must be used only to purchase diapering supplies and for related administrative costs. Not more than 15.0% of the funds appropriated in part 1 shall be expended for administrative purposes.

(2) By March 1 of the current fiscal year, the department shall submit to the report recipients required in section 246 of this part a report on the distribution of diaper assistance grant funds that includes, but is not limited to, the names and locations of grant recipients and the total amount of grant funding distributed to each recipient.

(3) Funds appropriated for diaper assistance grant shall be considered work project funds, shall not lapse at the end of the fiscal year, and shall be available for expenditures for projects under this section until the projects have been completed. The following is in compliance with section 451a of the management and budget act, 1984 PA 431, MCL 18.1451a:

(a) The purpose of the work project is to provide funding for grants for eligible entities to distribute diapers free of charge.

(b) The work project will be accomplished through partnerships with diaper assistance programs, maternity homes, and other nonprofit agencies.

- (c) The total estimated cost of the work project is \$4,404,400.00.
  - (d) The tentative completion date is September 30, 2028

Community Action Service Plans must adhere to the following state laws:

## COMPLIANCE WITH STATE RULES AND REGULATIONS

To comply with the Michigan Economic and Social Opportunity Act of 1981 (<u>Act 230 of 1981</u> and as amended <u>Act 123 of 2003</u>) and the associated <u>Administrative Rules</u> with the Act.

Under the supervision of the MDHHS, the bureau shall serve as a statewide advocate for social and economic opportunities for low-income persons and shall:



- (a) Coordinate state activities designed to reduce poverty and implement community social and economic programs.
- (b) Cooperate with agencies of the state and federal government and other public agencies, nonprofit private agencies, and nonprofit organizations in reducing poverty and implementing community social and economic programs.

## COMMUNITY SERVICES POLICY MANUAL (CSPM)

To comply with Bureau of Community Action and Economic Opportunity's (BCAEO) Community Services Policy Manual (CSPM) pertaining to the Community Services Block Grant Program, Diaper Bank narratives are to be developed using a process that assess povertyrelated needs, available resources, feasible goals and strategies, and that yield program priorities consistent with standards of effectiveness established for the Diaper Bank Program.

## SECTION II: ALLOWABLE AND UNALLOWABLE SERVICES

Assistance may include the following:

# Temporary Assistance for Needy Families (TANF) funding \$3,202,200 available statewide

- Direct delivery of diapers and/or diapering supplies to households with children under age 18 and at or below 200% FPL.
- Direct delivery of diapers and/or diapering supplies to diaper assistance programs, maternity homes, and other nonprofit agencies that distribute diapers free of charge and were established as of January 1, 2020 for distribution to households to households with children under age 18 and at or below 200% FPL.
- Subgrants to diaper assistance programs, maternity homes, and other nonprofit agencies that distribute diapers free of charge and were established as of January 1, 2020. Supplies issued with the funding are for distribution to households with children under age 18 years or younger and at or below 200% FPL.
- Eligible applicants may only receive up to four consecutive months of benefits within a 12-month period. The start date of the four-month period is the date of initial application.

# General Fund funding *\$1,202,200 statewide*

- Households that qualify under TANF guidelines if TANF funding has been fully expended.
- Direct delivery of diapers and/or diapering supplies to households with recipients 18 years or older and/or are greater than, or equal to, 200% FPL.
- Direct delivery of diapers and/or diapering supplies to diaper assistance programs, maternity homes, and other nonprofit agencies that distribute diapers free of charge and were established as of January 1, 2020 for distribution to households to households with recipients 18 years or older and/or are greater than, or equal to, 200% FPL.



 Subgrants to diaper assistance programs, maternity homes, and other nonprofit agencies that distribute diapers free of charge and were established as of January 1, 2020. Supplies issued with the funding are for distribution to households with recipients 18 years or older and/or are greater than, or equal to, 200% FPL.

Diapering supplies may be defined as wipes, ointment, powder, or other products similar in nature.

Assistance to households **may not** include the following:

• Anything beyond services or activities listed in the criteria above.

## SECTION III: NARRATIVE AND BUDGET INSTRUCTIONS

The FY2024 Diaper Bank Program allocations are based on survey feedback ensuring statewide coverage.

#### POLICY

CAAs shall prepare and submit the FY2024 Diaper Bank Narrative in accordance with the guidelines below.

**Narrative** – Complete the narrative plan for the period October 1, 2023 through September 30, 2024. Funding is available through September 30, 2028 or until fully expended, whichever comes first. Narratives can be extended or modified throughout the term of the funding as needed.

The narrative must include a list of partners as well as their ability to distribute diapers and/or diapering supplies to households for each set of funding administered. The most current list of diaper banks registered and identified by 2-1-1 can be found in <u>SharePoint</u> or by contacting your Grant Manager. This is not an inclusive list and is being provided as a reference.

One narrative per agency sufficient. Please indicate the funding sources being administered on the narrative.

**Expenditure Plan** - Complete the expenditure plan for the period October 1, 2023 through September 30, 2024, using the Excel sheet in SharePoint. Funding is available through September 30, 2028 or until fully expended, whichever comes first. Expenditure plans can be extended or modified throughout the term of the funding as needed.

Direct program expenses must be used only to purchase diapering supplies.

Up to 15% of the Grantee allocation can be used for administrative expenses.

- \$3,202,200 of the funding for this program is Temporary Assistance for Needy Families
  - Households with children under age 18 and at or below 200% FPL
  - The administrative expenses cannot exceed 15% of the allocation



- \$1,202,200 of the funding for this program is state General Funds.
  - Households with recipients 18 years and old and/or greater than, or equal to, 200% FPL
  - The administrative expenses cannot exceed 15% of the allocation

To ensure accurate intake and reporting between the separate funding sources and eligibility criteria, the funding sources will be administered in separate agreements with separate expenditure plans.

**Community Action Plans** – Complete your Community Action Plan (formerly Logic Models) in empowOR. If you need assistance with this, please contact MDHHS-empowORHelp@michigan.gov

## SUBMITTAL PROCESS

Grantees are to submit the program documents through SharePoint.

Questions regarding the Diaper Bank Narrative or SharePoint submissions should be directed to your grant manager.

## SECTION IV: INTAKE AND ELIGIBILITY GUIDELINES

When eligibility is being determined and/or diapers/supplies are being distributed directly by a Grantee, empowOR must be used for data collection to ensure accurate reporting. The Income Eligibility Guidelines in CSPM 502 are required to be followed. If a household is over 200% FPL or has a recipient over the age of 18, the General Funds portion of the program may be used. To maintain compliance with CFR 260.31, eligible TANF applicants may only receive up to four consecutive months of benefits within a 12-month period. The start date of the four-month period is the date of initial application.

As diapers and/or diapering supplies are distributed by a community partner that does not have access to empowOR, a "2024 Diaper Bank Program Self-Declaration of Low-Income and/or Public Benefits" Form must be completed that collects:

- Applicant name
- Applicant county
- Date of birth of recipient(s)
- Number of diapers and/or supplies distributed
  - Program eligibility as attested by one of the following:
    - the applicant is at or below 200% of the Federal Poverty Level,
    - A current (within past 12 months) recipient of:
      - Food Assistance Program (Supplemental Nutrition Assistance Program),
      - Family Independence Program,



- State Emergency Relief,
- Weatherization Assistance Program,
- Community Services Block Grant Assistance,
- Low- Income Household Assistance Program,
- or Supplemental Security Income, or
- Other (explanation is required)
  - If greater than, or equal to, 200% FPL, the annual income must be indicated.
- The following is beneficial for the program but not required:
  - Type of supplies issued (powder, wipes, ointment, diapers, etc)

The "2024 Diaper Bank Program Self-Declaration of Low-Income and/or Public Benefits" form may be found in <u>SharePoint</u> or by contacting your Grant Manager. If a grantee or subgrantee has a similar document that captures the information above, you may submit it to your Grant Manager for review and approval.

# SECTION V: REPORTING

At any given time, Grantees must be able to report, or BCAEO staff must be able to pull a realtime report from empowOR, on the following:

- Date of birth of recipient(s)
- Income eligibility level of recipient(s)
  - Indicated with FPL or categorically eligible program
- The number of diaper packs and/or diapering supplies distributed to each household and the county of the household.
- The number of diaper packs and/or diapering supplies distributed to each partner and name of the partner.
  - If sub-agreements are implemented for partners to purchase their own supplies, the number of packs and/or diapering supplies purchased by each partner is required.

Participating distribution partners must provide completed "2024 Diaper Bank Program Self-Declaration of Low-Income and/or Public Benefits" forms to the lead Community Action Agency in their region on the last business day of each month. Data from the forms must be detailed on a spreadsheet if it is not entered into empowOR to allow accurate and real-time reporting as required.

The "2024 Diaper Bank Program Self-Declaration of Low-Income and/or Public Benefits" forms must be kept on file by the lead Community Action Agency for monitoring and reporting requirements.

## **SECTION VI: OTHER**

## FUNDING

• \$3,202,200 of the funding for this program is Temporary Assistance for Needy Families





- Households with children under age 18 and at or below 200% FPL
- \$1,202,200 of the funding for this program is state General Funds.
   Households with recipients 18 years and older and/or greater than, or equal to, 200% FPL

To ensure accurate intake and reporting between the separate funding sources and eligibility criteria, the funding sources will be administered in separate agreements.

Grantees will be required to periodically report on spend and the forecasted spend throughout the grant program.

All funds must be fully expended by September 30, 2028.

Any Community Action Agencies that have received a notice of de-designation are not eligible for supplemental funding programs. In this case, the funding for the service area of a CAA in process of de-designation will be administered in that service area by an alternate CAA or other entity to be determined by BCAEO.



EFFECTIVE DATE	
ISSUE DATE	

APRIL 1, 2022 MARCH 15, 2022

# REFERENCES

• Social Determinants of Health Grant Agreement

# SECTION I: BACKGROUND

## PURPOSE

The program goal is that every eligible home will have access to hot and cold water and at least one functioning toilet, bathroom faucet, shower/bath, kitchen faucet, and laundry tub. It is also the program goal that the house has functioning wastewater drainage for water access to be sustainable in the home.

The SDoH Water and Plumbing Repair Program will assist customers based on a small assessment process to prioritize needs. Agencies are encouraged to prioritize the highest priority low-income, vulnerable, immune compromised individuals to be assisted first.

Funding for this program is provided through the MDHHS Social Determinants of Health project and is being utilized as a pilot to help demonstrate the need of repairs of this nature.

## Urban Water Repair Program:

Given the limited resources, applicants with no water or very low access to water are prioritized. With available funding the grant recipient will serve approximately 75 households with \$499,000 of funds administered by MDHHS-BCAEO. Average job cost is \$5,200. For jobs that include addressing external plumbing issues, additional costs can range from \$8,000-\$10,000 per home on top of the \$5,200 average.

## **Rural Water Repair Program:**

Rural communities have a need to assist with water repairs and plumbing assistance. Many households can no longer use their existing water system without well water and/or septic repairs/replacements. Unlike the urban program, water repairs, well replacements, and septic systems work tend to have a higher average cost. With available funding the grant recipient will serve approximately 50 households with \$499,000 of funds administered by MDHHS-BCAEO. The range could be from \$5,200 to \$13,000.

## SECTION II: PROGRAM IMPLEMENTATION

Intake staff will reach out to applicants and gather additional information about their plumbing situation. CAAs will create a list of priority points, based on the suggestions



below and/or determined by identified local needs. CAAs will serve residents with any of the identified plumbing/water issues that receive a priority point. Clients with any of the determined points are vulnerable amid the pandemic and may receive services. Agencies are encouraged to consider the client's level of need as determined by the priority points; however, any client with any displayed level of need may receive services at any time. The sample point list is below:

- 1. Do you have access to running water [No = 1]
- 2. Are you manually turning your water on and off at the main valve? [Yes = 1]
- 3. Do you have access to hot water? [No = 1]
- 4. Are you using a toilet in your home? [No = 1]
- 5. Are you able to take a shower or bath in your home? [No =1]
- 6. Are you able to wash your hands in your bathroom sink? [No = 1]
- 7. Can you use your laundry tub? [No = 1]
- 8. Are you able to use your kitchen sink to wash your dishes? [No = 1]
- Does wastewater regularly drain from your house? [No = 1]
- 10. Is your well currently functioning? [No = 1]
- 11. Is there necessary well treatment or maintenance that you have not had completed? [Yes = 1]
- 12. Is there necessary septic tank or field treatment or maintenance that you have not had completed? [Yes = 1]
- 13. Does your septic tank need to be pumped? [Yes = 1]

Agencies may customize this point list to meet the local area's plumbing/water repair need. Agencies are also encouraged to prioritize homes with children, seniors, vulnerable/immune compromised people or people with a disability.

Agencies with a waitlist are encouraged to utilize a prioritization assessment, where clients with no access to running water and a higher number of points are provided services first.

Staff schedule intake appointments with clients and collect 30 days of income to determine if households are at or below 200% of the Federal Poverty Level (based on CARES eligibility guidelines). See Section V: Eligibility Guidelines for more information.

After intake, plumbing/septic/well/HVAC contractors will conduct an assessment on the home and provide CAA staff with a list of necessary plumbing costs. At this stage, program approval is based on household plumbing repair costs and availability of funding. It is allowable for a partial work order to be completed, if it meets the stated program goal that every eligible home will have access to hot and cold water and at least one functioning toilet, shower/bath, kitchen faucet, and laundry tub. If the



household is approved, the CAA will pay the plumbing/septic/well/HVAC contractors directly to conduct the necessary repairs.

CAAs will follow procurement policies that comply with Uniform Guidance in order to obtain contractors for the repairs.

CAAs will have cost controls in place through a price list that all prospective contractors fill out as part of the RFP. The pricing list includes the most common installations, incidental materials needed for installations (i.e. screws, chalk, etc.) and standard hourly rates for each company's Master Plumber and Journeyman. Pricing is based on the total cost of labor and materials.

Alternatively, CAAs may bid out each job on an individual basis following rules outlined in 2 CFR 200. If agencies elect to use this option, they must adhere to contractual obligations, including the background checks of subcontractors. Please refer to the contract language for these requirements.

Payments must be made directly to contractors, and invoices must be retained and uploaded to FACSPro in the customer file. If the client has previously received a shut off notice from the water company based on a necessary repair and there is a fee associated with the restoration, then this program may cover the cost of that fee. Thorough documentation is necessary to discern that the payment covered such a fee from other components of a water bill.

## **Deferral/Denial Policy:**

Clients who do not meet either the Home Eligibility or Client Eligibility criteria will be denied.

Potentially eligible clients will be connected with a plumber or appropriate contractor for an assessment.

The agency will make a final determination of eligibility based on the contractor's assessment of the client's home. If the client's home does not meet the program eligibility criteria upon assessment of the contractor, the client will be denied. Clients that meet the program eligibility criteria may still be deferred or denied.

Additionally, agencies may include additional reasons for client deferral/denial in their own program policy, including, but not limited to:

- Client failed to submit paperwork within 30 days
- Client did not return call(s)/ email(s) within 30 days of the first attempted point of contact.
- Client no longer has an emergency need (e.g. repairs were completed between application time and time of contact)
- Funding has been depleted



- Client has necessary work beyond the scope of the program
- A home may be deferred due to health & safety concerns (e.g., sewage, pests, lack of safe access to home/basement, etc.). If a plumbing/septic/well/HVAC contractor is not willing to complete the work needed due to a health/safety hazard, either: 1) another contractor will have to be sourced to complete the work or 2) the client will be determined ineligible until the health/safety hazard has been resolved.

# SECTION III: ALLOCATIONS AND PLAN INSTRUCTIONS

## POLICY

Grantees shall prepare and submit Water and Plumbing Repair documents in accordance with the guidelines below.

**Work/Service Plan** – Complete the plan for the period April 1, 2022 through September 30, 2023 through the link provided in Survey Monkey during the Request for Proposal timeframe.

**Expenditure Plan** - Complete the expenditure plan for the period April 1, 2022 through September 30, 2023 during the Request for Proposal timeframe.

The administrative expense limit for this program is 15% of the grantee's allocation. Administrative funds do not count toward the job cost average.

Please reach out to <u>MDHHS-BCAEO@michigan.gov</u> for assistance. Technical questions for EGrAMS should be sent to <u>MDHHS-EGrAMS-Help@michigan.gov</u>.

## SECTION IV: REPORTING

The statewide database system currently collects all client demographics and stores client files. This information can be aggregated into reports to determine the number of clients helped, the amount, and their demographics.

## **Evaluation Questions for Monthly Reporting:**

- Does customer have access to hot water in their home?
- Does customer have access to running water in their home?
- Does customer have working toilet in home?
- Does customer's septic tank need to be pumped?
- Does customer's septic tank require treatment/maintenance?
- Does customer's well require treatment/maintenance?
- Does wastewater drain regularly from customer's home?
- Is customer able to take a shower/bath in home?



- Is customer able to use their laundry tub?
- Is customer able to wash hands in bathroom sink?
- Is customer able to wash hands in kitchen sink?
- Is customer turning water on/off at main valve?
- Is customer's well currently functioning?
- Did the repair consist of a replacement of the heating system?
- Did the repair consist of a replacement in lead service line?

## **Additional Reporting:**

- Report the reasons for denied applications.
- Customer Service Survey on
  - Feedback about the process
  - Feedback from households that were denied

# SECTION V: ELIGIBILITY GUIDELINES

To be eligible for the SDoH Water and Plumbing Repair program, the household income must be at or below **200% of the federal poverty level**. Income refers to total cash receipts (gross) before taxes from all sources (see Income Inclusions/Exclusions in CSBG CARES – CSPM 800) for all household members.

Client signatures options:

- Video chatting (FaceTime, Skype, etc.)/electronic signature software
- Email/Voicemail
- Mail the form(s)
- CAA staff can document their phone conversation
- In person

Sufficient reasoning must be documented, and kept with the approval, as to why the specific method of obtaining temporary approval was used, if applicable. 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.

## **Income Eligibility**

CAAs may determine income eligibility in one of two ways: Automatic eligibility or Income computations.

CAAs may use the following:



- Accepting eligibility certification paperwork from another Federal or State program as long as they do not exceed 200% of the Federal Poverty Level.
- Weatherization eligibility: if a customer is currently eligible for weatherization and on the agency's waitlist (or in another queue), the agency may use the eligibility determination for Weatherization as documentation of automatic eligibility for SDoH Water and Plumbing Repair services.

#### Income computations

An applicant's household's gross income for the **preceding 30 days**, including the date of application must be annualized and evaluated.

## **Documentation of income**

All income must be documented in FACSPro.

If automatic eligibility is utilized, the client self-declaration/affidavit or eligibility determination notice from another Federal or State program must be uploaded with the customer file.

If income computation is utilized, the income screens in FACSPro must be completed, and documentation of income must be retained in the client file.

Self-declaration of income or eligibility for another qualified State or Federal program may be used. The agency should demonstrate a reasonable effort to obtain income documents.

## CLIENT FILE

At minimum, the required items in the client file include:

- Client signature: See "Client signatures options" section of this CSPM.
- Income documentation: See "Documentation of income" section of this CSPM.
- Identification: All clients must provide identification to receive services.
- Proof of residence at property: Clients must also provide documentation that shows they live at the property. This may be contained within the identification or provided separately.
- Invoice(s): Invoices for payment to contractors must be retained and included in the client file.
- Landlord Agreement (if applicable): CAAs will provide renters with a landlord agreement that their landlord must sign and return.

Pre and post photographs are required of all measures addressed under this program, when reasonably attainable. Agencies are encouraged to utilize this method, at minimum, to verify work orders and completion. An agency may choose to keep job photographs on an agency system. The agency is responsible for supplying the



photographs to BCAEO staff upon request and in a timely manner. Agencies that do not wish to store their photographs on an agency system must upload photographs to the FACSPro client file.

## VERIFICATIONS

CAAs create their own internal policy on required verifications within the parameters of federal, state, and local policies. Verification requirements will vary from agency to agency. Appropriate verifications to support serving the client should also be retained in the client file.

## **SECTION VI: FUNDING**

Reallocations may take place at any time depending on the needs for a region and overall program demand. BCAEO reserves the right to re-allocate funds from participating agencies to ensure the maximum amount of assistances are completed statewide.

Any Community Action Agencies that have received a notice of de-designation are not eligible for supplemental funding programs.



EFFECTIVE DATE	June 1, 2022
ISSUE DATE	May 23, 2022

#### REFERENCES

- <u>CSPM 900 Series</u>
- <u>CSPM 1200 Series</u>
- <u>Michigan Energy Assistance Program Manual</u>
- <u>State Emergency Relief ERM 301</u>
- Code of Federal Regulations Part 200

## **SECTION I: BACKGROUND**

#### PURPOSE

To meet home energy needs of low-income households at their primary residence when their primary heating source is deliverable fuel.

## SECTION II: PROGRAM IMPLEMENTATION

#### CAA Responsibilities:

- CAAs must be listed in Michigan's 211 profile and partner with MDHHS to become a Navigator/Referral Partner in MI Bridges to assist clients with the SER application and verify benefits as applicable.
- Provide direct energy assistance payments on behalf of eligible deliverable fuel customers. Acceptable proof of SER eligibility is described under Client File below. CAAs may accept a statement from the vendor or the client that their heating source is at or below the minimum amount.
- Ensure that the household cap for deliverable fuels of \$2,000 is not exceeded.
- Ensure that direct energy payments are released only to eligible home energy suppliers. All home energy suppliers must be registered in the State of Michigan's SIGMA Vendor Self-Service System (VSS) (<u>https://www.michigan.gov/dtmb/procurement/contractconnect/how-to-register</u>) and be enrolled as an eligible supplier by MDHHS.
- Issue a 1099-Misc Form to each vendor (provider) who received \$600 or more in Deliverable Fuel funds, see 'Specific Instructions.' State of Michigan's guide for 1099 Reporting and IRS Instructions for the 1099-MISC.
- Encourage potentially eligible households (at or below 110% FPL) to pursue the availability of the Home Heating Credit. Applications for the <u>Home Heating Credit</u> can be filed from January 1 through September 30 of each year.

#### **Energy Assistance Definitions**

 "Crisis" means one of the following: 1) a residential fuel tank is estimated to contain no more than 25% of its heating fuel capacity; 2) a stated need for deliverable fuel or a nontraditional fuel source in which there is no meter or regular energy bill provided

• "Eligible low-income household" means a household with an income of not more than 150% of the Federal Poverty Guidelines.

## Allowable Services and Expenditures

- Direct energy assistance payments on behalf of eligible households to registered vendors.
- Administrative costs not to exceed 10% of the CAA's total allocation.
- Direct program costs that directly support the activities of the program and comply with 2 CFR 200.

#### Unallowable Services

Deliverable Fuel funds are not to be used for the following:

- Payments to residential landlords, residential management companies, billing service agencies, or collection agencies are not eligible to receive emergency service or Deliverable Fuel funds, as they are not the actual service provider.
- Secondary household fuel types and cooking gas: Payment may only be approved for the primary heating source.

## SECTION III: ALLOCATIONS AND PLAN INSTRUCTIONS

#### POLICY

Grantees shall prepare and submit Deliverable Fuel documents in accordance with the guidelines below.

**Work/Service Plan** – Complete the plan for the period June 1, 2022 through September 30, 2022.

**Expenditure Plan** - Complete the expenditure plan for the period June 1, 2022 through September 30, 2022.

# The administrative expense maximum for this program is 10% of the grantee's allocation.

Please contact <u>MDHHS-BCAEO@michigan.gov</u> for assistance. Technical questions for EGrAMS should be sent to <u>MDHHS-EGrAMS-Help@michigan.gov</u>.

## **SECTION IV: REPORTING**

The CAA is required to enter all required information in FACSPro (or an alternate system pre-approved by BCAEO). BCAEO will extract data for program analysis. CAAs must verify that the information in FACSPro is correct, complete, and consistent with the CAA's monthly Statement of Expenditure.

Note: CAAs are required to enter all data in real-time to ensure up-to-date reporting.

BCAEO will aggregate statewide reports based on the information in FACSPro. The report requires CAAs to use Award Pro and fully complete Action Plans (one Action Plan per household). BCAEO will also extract the following:

- Customer demographics, including Social Security Numbers
- MDHHS case numbers
- Amount paid to each vendor and customer account numbers (via AwardPro)
- Customer Action Plans

## SECTION V: ELIGIBILITY GUIDELINES

Households will be determined eligible based on the State Emergency Relief application process.

Households who present with an energy crisis will initially apply for the State Emergency Relief (SER) program, either directly with MDHHS or with assistance from a CAA MI Bridges Navigator, and MDHHS will determine eligibility for LIHEAP assistance through SER. Households who qualify for SER energy services will be eligible for deliverable fuel assistance through the CAA.

**Note**: if a household has already received an electric or heat payment through SER since October 1, 2021, that household can be considered eligible for deliverable fuel assistance this program. It is not necessary to reapply for SER.

When assistance is provided for a deliverable fuel, the CAA must obtain a copy of the service invoice prior to issuing payment. Approval should be based on an estimate provided by the service provider. The amount issued to the provider cannot exceed the estimated amount which was used for the eligibility determination. Retain a copy of the invoice which documents the amount of deliverable fuel provided and the amount of the deliverable fuel in the tank prior to delivery.

## CLIENT FILE

Agencies must maintain a client file for all recipients of Deliverable Fuel funds which must be uploaded to FACSPro. At a minimum, the file must include documents used to verify identity, residency, and eligibility, including:

- Any check lists or other documentation used by the CAA to ensure that all required client information is gathered, documented, and retained in the client file, including:
  - Full name of the client and all members of the household
  - Social Security Number of household members
  - MDHHS Case Number for household
  - Address, City, Zip Code, and County
  - The client and the intake worker's signatures
- Acceptable proof of SER eligibility includes DHS-1419 SER Decision Notice, Navigator screen print of SER eligibility, or documentation of collateral contact with MDHHS which must include date, signature of the agency representative, along with the name of the MDHHS staff person who provided the information. Note: The "Dates Covered" must include a starting date equal to 10/1/2021 or later. The DHS 509 does not include this date and should not be used.

- The energy type and dollar amount of assistance, and a copy of the utility bill or estimate for deliverable fuel (LP Gas/Propane, Fuel Oil, and Coal), wood or other non-traditional fuel. If the address on the utility bill is different than the address of the client, an explanation must be included in the client file. If the name on the utility bill is different than the client's name, an explanation must be included in the client file.
- The documents must contain a date on which the activity occurred, what the activity included.
- FACSPro Customer Report
- Copy of Award from Award Pro
- Completed Action Plan

#### Notice of Eligibility/Eligibility Determination Letters

A notice of eligibility should be given to all applicants notifying whether the application was approved or denied. If the application is approved, the notice should include any contributions the household must make to resolve the emergency. If the application is denied, the notice should include the reason for denial. All eligibility notices must include information on how to request a review of denial.

Agencies may have a generic letter available that should be given to clients upon determination. A copy of the letter is not required as part of the file documentation.

All applicants should be made aware of the agency appeals process. If an applicant appeals a denial, the agency must inform the BCAEO Grant Manager within five days.

# DATA CONFIDENTIALITY (PERSONALLY IDENTIFIABLE INFORMATION (PII) AND PERSONAL HEALTH INFORMATION (PHI))

CAAs must keep and maintain data in strict confidence, using such a degree of care as is appropriate and consistent with policy to avoid unauthorized access, use, disclosure, or loss. CAAs are responsible for maintaining a backup of the data and for an orderly and timely recovery of such data. CAAs must notify their grant managers immediately in the event of any act, error, or omission, negligence, misconduct, or breach that compromises data security.

#### TEN DAY STANDARD OF PROMPTNESS

Agencies shall observe a 10-day standard of promptness in the process of eligibility determination and benefit issuance for complete and timely filed applications.

#### SECTION VI: FUNDING

Reallocations may take place at any time depending on the needs for a region and overall program demand. BCAEO reserves the right to re-allocate funds from participating agencies to ensure the maximum amount of assistance is provided statewide.

Any Community Action Agencies that have received a notice of de-designation are not eligible for supplemental funding programs.