



800 Series

Community Services Policy Manual

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EFFECTIVE DATE **October 1, 2021**
REVISED DATE **September 20, 2021**

REFERENCES

- The CSBG Act, P.L. 97-35 of 1981, as amended by the Coates Human Services Reauthorization Act of 1998.
- The CSBG Act, as amended by the Human Service Amendments of 1994 (P.L. 103-152)
- CSPM Item 402.1 – Program Accounts & Cost Categories for CSBG
- The CARES Act, P.L. 116-136
- Title V of Division A of the third coronavirus relief package; H.R. 748, the annual update of the Department of Health and Human Services (HHS) Poverty Guidelines
- 45 C.F.R. 2552.47

POLICY UPDATES

200% FPL updated through duration of funding
Lookback period changed

BACKGROUND

PURPOSE

Title V of Division A of the third coronavirus relief package (the Coronavirus Aid, Relief, and Economic Security [CARES] Act) creates a Coronavirus Relief Fund (CRF), to prevent, prepare for, and respond to coronavirus and impact the coronavirus has on communities, which shall be used for carrying out activities under sections 674 through 679 of the Community Services Block Grant Act. This is being referred to as the CSBG CARES Act Supplemental.

In a Supplemental, the regular federal rules apply unless otherwise specified. For the CARES funding, all CSBG requirements are intact, except:

- All CARES Act funds must be expended by agencies by September 30, 2022

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

COMPLIANCE WITH FEDERAL RULES AND REGULATIONS

- Community Services Block Grant (CSBG) Act, [Public Law 105-285](#)
- CSBG Information Memorandum (IM) #154 Disaster Flexibilities and Waivers.

COMPLIANCE WITH STATE RULES AND REGULATIONS

To comply with the Michigan Economic and Social Opportunity Act of 1981 ([Act 230 of 1981](#)) and as amended ([Act 123 of 2003](#)) and the associated [Administrative Rules](#) 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 do:

- (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, CARES Service Plans are to be developed using a processes that assess poverty-related needs, available resources, feasible goals and strategies, and that yield program priorities consistent with standards of effectiveness established for the CARES program. The CARES Service Plan should identify eligible activities to be funded in the program service areas and the needs that each activity is designed to meet.

STATE PLAN AND APPLICATION REQUIREMENTS

As required by the CSBG Act, Public Law 105-285, states are required to submit a state plan as a condition to receive funding. Information provided in the CAP by eligible entities is included in [Michigan's State Plan](#). There will be an amendment to the state plan for the CARES funding.

TITLE VIII – Departments of Labor, Health and Human Services, Education And Related Agencies

Includes \$172.1 billion to ensure that people on the front lines of the pandemic have the resources to prepare for, prevent and respond to the crisis, including funding that builds off of the initial Coronavirus Preparedness and Response Supplemental Appropriations Act by making additional investments in healthcare, vaccine development, support for state and local governments' prevention and response efforts, and the purchase of critical medical supplies. It also includes a substantial investment in education, childcare and other social services programs to support schools and communities during the economic crisis resulting from the pandemic.

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Highlights include: Community Services Block Grant (CSBG) – The bill includes \$1 billion for CSBG to help communities address the consequences of increasing unemployment and economic disruption.

It is expected that CAAs 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 must expand 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.

Further instructions on tracking and evaluating the CAAs recovery responses and efforts to the COVID-19 pandemic will be issued.

CAAs must immediately implement and monitor their COVID-19 safety protocols and policies. Continual training and diligence in following all safety recommendations from the CDC and the State of Michigan is mandatory.

The **FY2020** CARES planning allocations are based on Michigan's funding level. \$32,591,700 will be available in CAA 90% formula funds for distribution for the period April 1, 2020 through September 30, 2022.

In addition to the 90% formula funds, smaller CAAs will receive Discretionary funds to meet the minimum funding level of \$175,000.

CARES ALLOCATIONS AND PLAN INSTRUCTIONS

NOTE: Service Plans and Budgets are not required for FY22. They were already submitted for the complete funding period.

POLICY

CAAs shall prepare and submit an FY2020 CARES Service Plan in accordance with the guidelines below.

Service Plan – Complete the plan for the period April 1, 2020 through September 30, 2022, using the Application and Instructions.

- Include the agency's Emergency Policy
- Include Equipment Waiver – if applicable

CARES Expenditure Plan - Complete the expenditure plan for the period April 1, 2020 through September 30, 2022, using the Excel sheet in SharePoint.

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 emergency services. Funds should be used to reach more people and expand emergency services.

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Budgets should reflect a large amount of funds in the first 3 to 6 months of the funding term to demonstrate immediate relief.

Logic Models – Complete your logic models for the FY22 CARES funding in FACSPRO by **October 15, 2021**.

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

CARES Annual Report - A CARES Annual Report must be created in FACSPRO by **October 1, 2021**

SUBMITTAL PROCESS

Grantees are to submit the Service Plan documents through SharePoint. See detailed instructions in [SharePoint](#).

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

ALLOCATION AMENDMENT APPLICATIONS

The final CARES Allocation had an increase. \$33,035,585 will be available in 90% formula funds to those CAAs in good standing for distribution for the period April 1, 2020 through September 30, 2022.

CAAs shall prepare and submit a modification/amendment to their FY2020 CARES Plan in accordance with the following guidelines:

NOTE: Upon approval, agency is required to update their statement of expenditure (SOE) budget total.

DUE DATE

Updated documents are due **January 15, 2021** to the agency's SharePoint folder. Please notify your grant manager so BCAEO can review and approve as the plans come in.

PLAN AMENDMENT SUBMISSION REQUIREMENTS

- REVISED CARES Application –**As Needed**

Submit a revised plan with the following:

- To *include* activities/charges not previously identified in the original plan or
- To *remove* activities/charges that were included in the original plan but are not being done.

CARES DISCRETIONARY AWARD

- **Small Agency \$175,000 Minimum Amount:** A portion of CARES Discretionary funds will be used to assist small agencies (included as part of the CARES allocation) in receiving a minimum amount of CARES funding. **NOTE:** Discretionary funds should be spent first so it is not lost at the end of the fiscal year.
- **CAA Discretionary Projects:**
This year, the BCAEO will devote CARES discretionary funding to make provisions for competitive awards focused on the priorities of a CAA's Community Needs Assessment and Coronavirus response.

Recipients of these CARES funds are required to demonstrate that all customers to be served by funded projects have an income at or below **200%** of the current US Department of Health and Human Services (US DHHS) Poverty Guidelines. (CSPM Item 208).

A portion of the state's CARES Discretionary funds have been set aside specifically for projects and initiatives to address needs identified by local CAAs. Projects must eliminate a cause or condition of poverty, promote self-sufficiency or promote community revitalization in the CAA's service area. Funds must be used to prepare for, prevent, or respond to the Coronavirus.

BCAEO is making a total of up to \$300,000 available to fund awards:

Innovative/Asset Building	
Total Number of Awards:	TBD based on awarded bid amounts
Total Amount to be Granted:	\$300,000
Max Amount per Award:	\$50,000 per award
Term of Awards:	12 months

NOTE: Not all grant applications will be awarded - more grants will be approved if funding becomes available.

All eligible applicants are invited to either expand an effective and successful existing project scope, or to initiate innovative new strategies to implement a project to advance the assurances of the CARES Act.

Any Community Action Agencies that have received a notice of de-designation and/or that have received a State Technical Risk Assessment (STAR) Score of 3 or below are not considered in good standing and are therefore ineligible for supplemental funding programs.

DUE DATE

Applications must be received in the MDHHS-BCAEO mailbox by January 15, 2021 at 5:00 PM as stated on the cover of the RFA.

Applications received after the deadline will not be considered. All applications will first

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be reviewed for completeness to determine if they will be scored.

Proposals deemed incomplete will be rejected. An incomplete proposal is one lacking information where requested.

SUBMITTAL PROCESS

Grantees are follow the CARES RFA Instructions to submit the following documents to the MDHHS-BCAEO@michigan.gov mailbox by the due date:

Required Documents:

- CARES Request for Application
- Any Supporting Documents

ELIGIBILITY GUIDELINES

ASSETS

Asset Testing is waived for CARES Funding.

INCOME ELIGIBILITY DETERMINATION

Use the **200%** of poverty income guidelines to determine eligibility for services provided with CARES funds. Income refers to total cash receipts (gross) before taxes from all sources (see Income Inclusions/Exclusions below) for all household members. See CSPM 502 for more detail.

ENTERING INCOME IN FACSPRO

Income information must be entered into the Income screens of FACSPRO to compute whether the household is under the **200%** FPL threshold and thus income eligible for CSBG – CARES

OR

For households determined to be automatically eligible for CSBG – CARES, agencies can check the *CARES auto eligibility* box in Demographics under Characteristics.

For reporting purposes only, please enter a client's self-reporting of annual income in the Self Determination for Annual Income section of the income screen. See FACSPRO Guide in [SharePoint](#).

NOTE: The auto-eligibility box must not be used to get around entering income for the entire household unless the entire household is auto-eligible.

AUTOMATIC ELIGIBILITY FOR EMERGENCY SERVICES

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CAAs may use the following:

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

Grantees must maintain client eligibility documentation for the service the client was, or is, eligible for using FACSPRO or an alternate system approved by BCAEO. In addition, agencies are required to keep information on clients served as well as an indication/notation identifying what agency program or service the client (household or household member) is, or would be, eligible for in the FACSPRO system or an alternate system approved by BCAEO. (“Would be” meaning they are not a current client but would meet eligibility requirements if they applied for a program/service identified at the time the CARES assistance was provided.)

INCOME COMPUTATIONS

There is no prescribed look-back period for income assessment. Depending on an individual client’s circumstances and the documentation available, it may be reasonable to calculate client income based upon the household’s gross income in the past 30 days (multiplied by 12) or based upon a review of the past year.

Example: if a client has become unemployed or was the victim of domestic violence and has left the abusive household within the past year, it may be inaccurate to use the data of the past year to assess income, and the use of a shorter period— perhaps several months—may be a more appropriate and accurate assessment of the client’s income.

In addition, case-by-case circumstances such as seasonal employment or an isolated and temporary spike or decline in earnings may require an eligible entity to exercise reasonable discretion to determine on a case-by-case basis the most appropriate time period to review to most appropriately and accurately assess income. It is recommended that no time period shorter than the past 30 days or longer than the past year should be used, however. In exercising this reasonable discretion, the eligible entity’s goal in each case should be to most accurately determine a client’s actual financial position at the time of assessment.

NOTE: Grantees must use the choices in FACSPRO to annualize and determine eligibility: 30 days, 3 months, 6 months, or 12 months.

For each household member, the income computation process should include actual received current gross income documentation, current and prior monthly benefit documentation, W-2s or income tax returns for prior year’s income, and, **as a last resort**, self-declarations. (See **Self-Declarations** below).

Irregular Income – For irregular income such as child support not following the court order or migrant/seasonal workers only getting money seasonally, determine the standard monthly amount by adding the amounts entered together and dividing by the

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number of months used. Clearly document the income computation method and source.

Best Practice – Pay period ending dates should not be used unless it is documented that the applicant/household member receives their payments on the same date.

DOCUMENTATION OF INCOME

All income must be documented and uploaded to FACSPRO or an alternate system approved by BCAEO.

Note: A self-declaration of the applicant may be used, but only as a last resort. The intake worker should record the steps taken that will demonstrate a reasonable effort was made to obtain income documents. See CSPM 502 for more detail.

- Grant Manager approvals are waived for zero income self-declarations for CARES Funding
- Notary signatures are waived for CARES Funding.

CLIENT SIGNATURES

Agencies should take necessary steps to obtain client signatures. If COVID19 is still affecting clients, please follow the guidelines below.

- 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.

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- 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 [SharePoint](#).

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

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 “roofer” is not considered a member of the “household” and the income of the “roofer” is not counted for income eligibility. However, the rent from the roofer should be included as income. When annualizing income, the income from rent payments should only be included for the months that rent was received.

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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).

Migrant Income Computation and Self-Declarations of Income

Self-Declarations of Income for Migrants may be used to capture income information as a last resort after all other options have been exhausted. Due to the nature and frequent changes in employment of Migrants, it is not necessary to complete the income screens in FACSPRO or an alternate system approved by BCAEO for this population. The documentation is required to contain case notes of why the Self-Declaration was used by Grantee staff and uploaded into FACSPRO or an alternate system approved by BCAEO as part of the case file and detailed notes. The annualized income must adhere to CARES Federal Poverty guidelines.

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*.
4. Railroad 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. Unemployment compensation, or Strike Benefits from Union Funds.

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8. Worker's compensation, and/or private long-term or short-term disability payments.
9. Veteran's Payments: VA Service Connected Disability Compensation; VA Non-Service Connected Disability Pension; Military Retirement Pay, and Military Family Allotments.
10. Temporary Assistance for Needy Families - TANF, Family Independence Program-FIP (Cash Assistance Title IV) and State Disability Assistance (SDA).
11. Adoption Subsidies and Independent Living Stipends (if there are no restrictions on use).
12. Training stipends.
13. Court-ordered Child Support and Alimony or Spousal Support.
14. Private Pensions, Government Employee Pensions, and other Retirement income.
15. Insurance or annuity payments.
16. 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.
17. Income from Dividends, Interest, Stocks or Bonds.
18. Periodic receipts from Estates or Trusts.
19. Net Rental Income, including from Roomers.
20. Net Royalties; Net Gambling/Casino, or Lottery winnings.
21. Tribal Payments - Any payments received by Native Americans, such as from Casino income or other Tribal income.
22. Joint Income received by more than one individual. Divide the income equally among recipients.
23. 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 credits, including the Earned Income Tax Credit and Child 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. 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), 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. CARES ACT Stimulus check or other federal impact payment

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.

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 childcare provider's cost of meals for children. Do **not** allow costs for the provider's own children.

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- 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.

INCOME ELIGIBILITY DETERMINATION EXCEPTION

When CARES funds support short term services with limited intake procedures, and individual income verification is not possible or practical, the Grantee may not always be required to conduct individualized eligibility determinations. This may happen if services are:

1. Provided to a group, rather than to individuals, and circumstances indicate that group members will predominantly be income-eligible

Examples:

- a. Financial literacy (or other program) information and materials provided at community gathering in low-income area or to Head Start parents
 - b. Donations of food or meals
 - c. Summer meals for youth
2. Provided on individual basis but impossible or impracticable to obtain income documentation

Examples:

- a. Part of outreach to potential clients, such as open house at CAA
 - b. Initial intake and information referral process
 - c. Temporary shelter to homeless individuals
 - d. Disaster relief
3. Intended to increase community awareness of or involvement in poverty issues
 - a. Poverty Forum
 - b. Building Partnerships with other organizations

NOTE: CAAs should make every effort possible to obtain client information to include in the CSBG Annual Report.

To exclude eligibility determination for certain programs/clients, CAAs must document the following:

- a. Name of program
- b. Service Area
- c. Reason for eligibility determination exclusion (1,2, or 3 above – or other)

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- d. Proof that the clients will be predominantly income-eligible. (Census data, Community Assessment documentation of the neighborhood, percentage of low-income people in area, etc.)

NOTE: For all programs that are supported by CARES funds, Grantees must provide reasonable, documented evidence that the proportion of program clients who are CARES-eligible is equal to or greater than the proportion of program costs paid with CARES funds, or the proportion of program staff time devoted to serving CARES-eligible clients is equal to or greater than the proportion of program costs paid with CARES funds.

Example: If CARES supports 30% of a program's costs, the agency must be able to demonstrate that at least 30% of the clients served have incomes at or below 200% of the federal poverty level, or at least % of staff time is allocated to serving CARES-eligible clients.

Example: if 10% of clients are documented as eligible, no more than 10% of funds should come from CARES.

Example: The CAA could provide evidence that due to the venue in which a particular service is provided, such as meals provided in an emergency homeless shelter, it could reasonably be assumed that clients meet the CARES income guidelines.

OTHER INFORMATION

CLIENT FILE

Grantees must maintain a client file for all recipients of CARES services. All required file documents must be maintained by the agency including uploading documents to FACSPRO or an alternate system approved by BCAEO (See CSPM Item 909).

REDETERMINATION

Redeterminations for CARES eligibility do not have to be completed for clients that have received CSBG services in the past 12 months (1 year).

BACKGROUND CHECKS

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