



401 Hathaway Building • Cheyenne, WY 82002
Phone (307) 777-7656 • 1-866-571-0944
Fax (307) 777-7439 • www.health.wyo.gov



Michael A. Ceballos
Director

Mark Gordon
Governor

Dated: March 20, 2020; April 3, 2020; April 8, 2020, April 15, 2020 sg

To: Community Services Block Grant (CSBG) Grantees

From: Community Services Program

Reference: CSBG COVID-19-Related Impact Program Guidance

COVID-19-Related Impact Program Guidance

This memorandum provides guidance to the Wyoming Community Services Program (CSP) Grantees and Sub-Grantees to prepare for and respond to the impact of COVID-19 on program operations.

During emergencies and disasters, members of the low-income population are almost always affected disproportionately. A lack of available resources and reduced access to resources may limit these individuals' and families' ability to prepare for, respond to, and recover from the current public health emergency. As the Coronavirus Disease continues to spread across the country and in Wyoming's communities, we can only expect that Wyoming residents will continue to be impacted. Assisting Grantees and Sub-Grantees in the continued provision of services and supporting our programs in times such as these is at the very core of the mission of the CSP and CSBG.

Contingency Plans:

The CSP recommends that your agencies create a contingency plan as soon as possible. Please take the following into account:

- Identifying essential services, and develop a policy regarding implementation of essential-only service operation
- Identifying and encouraging remote work assignments where applicable, including the revision or implementation of policies regarding flexible worksites and hours
- Limiting physical contact with clients and members of the public as applicable, including intake procedures via telephonic and online communication; limiting lobby congregations; and, encouraging appointment-only consultations
- Increasing and maintaining of sanitation and hygiene practices for shared spaces and material goods

Payment of Salaries and Wages and Fringe Benefits:

Grantees’ and Sub-Grantees’ practice for how to deal with payment of salaries, wages, and fringe benefits, including leave, should be conducted in a manner consistent with their organization’s policies. Federal grant funds may be used to pay for different types of leave (e.g. sick, emergency closures, etc.) so long as Grantees and Sub-Grantees follow criteria for a leave policy as set forth in the Uniform Guidance.

The Uniform Guidance specifically states that the cost of leave may be charged to federal grants if:

- i. The leave is provided under the established written leave policies;
- ii. The costs are equitably allocated to all related activities; and
- iii. The organization uses a consistent accounting basis for costing each type of leave

The costs must also meet the basic considerations for cost allowability in 45 CFR § 75.402-411, requiring that all costs be necessary, reasonable, and allocable.

Grantees and Sub-Grantees should amend or put in place a formal policy that provides for paying staff in light of sick leave, emergency closure, or other reduction in staffing. Payment of salaries, wages, and benefits cannot be retroactively paid if a formal policy was not in place. Again, policies should include the above criteria.

Client Eligibility:

To be eligible for CSBG services or benefits, clients must be at or below 200% of the 2019 Federal Poverty Line (FPL) as determined by the federal Office of Management and Budget (OMB) based on the most recent federal Census data and as revised annually (or more frequently) by the U.S. Department of Health and Human Services (see table below).

2019 Federal Poverty Guidelines	
<i>Persons in Family/Household</i>	<i>200% Poverty Guideline</i>
1	\$24,280
2	\$32,920
3	\$41,560
4	\$50,200
5	\$58,840
6	\$67,480
7	\$76,120
8	\$84,760

In accordance with CSBG Information Memorandum #154: Disaster Flexibilities and Waivers, the CSP is allowing for the use of the COVID-19 Affidavit of Eligibility form (Attachment A), for services providing the following:

- Food pantry/meals
- Medical supplies/prescriptions
- Household/hygiene products
- Clothing

The process for verifying client eligibility as outlined in Information Memorandum-2020-01: FY2020 Client Eligibility (Attachment B) still pertains to all other service provision at this time, in that anyone receiving services supported by CSBG funds must not have an income that exceeds 200% of the Federal Poverty Level, and there must be documented proof of income for the past 30 days. All other services including, but not limited to case-management, financial assistance, housing, education, and any other services being provided not otherwise mentioned above, should maintain the practice of client eligibility and income verification consistent with Information Memorandum-2020-01: FY2020 Client Eligibility.

Sanitation and Janitorial Charges:

CSBG funds may be used for costs associated with the health and safety of facilities, such as costs for sanitation, gloves, and cleaning services, and CSBG funds may also be used to make facilities usable and accessible.

Use and Distribution of Gift and Pre-Paid Cards:

The purchase and distribution of gift, gas, and other pre-paid cards is an allowable charge to CSBG, especially during times of emergency and crisis, so long as agencies follow CSP Policy #6: Purchase and Distribution of Gift and Gas Cards. Ensure providing such aligns with your agency's service provision stated in the WDH FY2020 Contract Statement of Work.

Medical Supplies Requests:

If your agency needs medical supplies (gloves, respirators, etc.) to continue service provision, please contact your local county Emergency Manager and put in a request for supplies. Contact Information for such can be found here: <https://hls.wyo.gov/contacts/county-contacts>. Your local county Emergency Manager will fulfill that request with the supplies on hand locally. If your county needs additional supplies and cannot fulfill requests with local stock, the Emergency Manager will place a request with the State of Wyoming.

Program Operations:

Should Grantees and Sub-Grantees reduce hours or days of program operations, make certain that appropriate notifications are posted for your clients and consider adding changes to telephone greetings and email signatures. Please notify CSP of any changes in times of program operations via email, at sarah.green@wyo.gov.

Tripartite Board Business and Communications:

Due to the varied nature of Grantee and Tripartite Board structure; i.e. county governments, association of governments, private non-profit entities, etc., Grantees should seek their own legal counsel as to the requirements of conducting board business via telecommunications. For public Grantees that fall under the guidelines of the Wyoming Open Meetings Law, please refer to the Public Meetings Act for guidance on how to conduct official business. Specifically, Wyo. Stat. Ann. § 16-4-402(a)(iv) states:

“Assembly” means communicating in person, by means of telephone or electronic communication, or in any other manner such that all participating members are able to communicate with each other contemporaneously.

For private Grantees and Tripartite Boards, please refer to your board bylaws to determine meeting requirements, and the use of telecommunications for such.

Public hearings occurring for the purpose of the 2021 Application for Funds can be conducted via telecommunication systems. Using a video conferencing platform (Zoom, Skype, and Google Hangouts) in order to conduct the hearing is allowable, given that ample notice of the meeting and coordinating access to the appropriate communication for participants is considered.

Signature Waivers:

If client signatures cannot be obtained due to social and physical distancing measures, such as intakes and consultations occurring via telecommunications, a verbal self-attestation from the client can stand in place of a physical signature. Indicate on the COVID-19 Affidavit of Eligibility client signature line that verbal attestation from the client was given, with a date stamp. A staff signature affirming such will still be required on the COVID-19 Affidavit of Eligibility form. If your agency has electronic signature capabilities on intake forms, that is allowable.

Stimulus Payments:

Stimulus payments from the federal government in relation to the Coronavirus Disease will not be considered income, and will not be considered in determining a household's Federal Poverty Level (125% or below).

Organizational Standards:

It is expected that agencies will continue to follow the Organizational Standards and the timelines for completing Technical Assistance Plans. If you run into an issue, please contact the Community Services Program Manager at sarah.green@wyo.gov.

Community Needs Assessments:

It is expected that agencies will continue to conduct Community Needs Assessments within the required three-year timeframe. If you run into an issue, please contact the Community Services Program Manager at sarah.green@wyo.gov.

Monitoring:

Monitoring activities for this current fiscal year, both for CSP monitoring of Grantees and Grantee monitoring of Sub-Grantees, shall remain as stated in the 2020 WDH Contract Statement of Work. Be reminded that Grantees are not required to use the CSP Sub-Grantee Monitoring Tool, and have discretion as to how they complete on-site monitoring visits. If you foresee a conflict or reason to deviate from the contract deliverable, please contact the Community Services Program Manager at sarah.green@wyo.gov.

Contract Amendment Flexibility:

Budget Reallocation

Due to the impact of COVID-19 on Wyoming communities, and the resultant impact on Grantee and Sub-Grantee programs, the Community Services Program (CSP) will instill the following flexibilities related to budget allocations.

The current 2020 Wyoming Department of Health, Community Services Program contract states:

“Up to twenty percent (20%) of the total allocation can be shifted between the services and activities categories with prior approval by the Community Services Program Manager.”

The CSP can amend contracts to state:

“Up to thirty percent (30%) of the total allocation can be shifted between the services and activities categories with prior approval by the Community Services Program Manager.”

Budget reallocations of up to 30% of the total allocation will only be permitted in direct costs. Federal guidance specific to the Community Services Block Grant (CSBG) states that direct costs are,

“identified with delivery of a particular project, service, or activity undertaken by a grantee to achieve an outcome intended by the funding program... direct program costs are incurred for the service delivery and management components within a particular program or project. Therefore, direct program costs include expenditures on some activities with administrative qualities, including salaries and benefits of program staff and managers, equipment, training, conferences, travel, and contracts that expressly relate to the delivery of an individual program or service.”

(CSBG IM # 37: Definition and Allowability of Direct and Administrative Cost Block Appropriation and Allocations, 1997, p. 2)

The ability to reallocate up to 30% of the total allocation will go into effect immediately upon request and approval from the Community Services Program Manager. Reallocation and spending consistent to such can begin without a fully executed amendment. Requests for a budget reallocation must be approved by your Tripartite Board.

For Grantees that serve multiple counties, allocations must remain within each county. The ability to reallocate up to 30% of the total county allocation remains. Funds from one county cannot be transferred to another county.

Statement of Work/Service Revision

There may be times where Grantee and Sub-Grantee original service provision may be impacted by COVID-19, where services may not be performed due to closures and guidance from various authorities, or times when services cannot be provided due to a shortage of goods and funds. Service provision may have to change, which ultimately changes the contract Statement of Work. The CSP will work with Grantees and Sub-Grantees individually on a case-by-case basis if service provision is altered and contract amendments need to occur. A determination will be made as to whether the altered service provision was a direct result of COVID-19. All service provision alteration requests need to be requested from the CSP via email, at sarah.green@wyo.gov.

This situation is evolving rapidly, and new developments and recommendations are being given regularly from the Wyoming Department of Health (health.wyo.gov), Wyoming Governor's Office, the Federal Office of Community Services, the Centers for Disease Control and Prevention (cdc.gov), and the Executive Office of the President. The CSP will revise this guidance as necessary to comply with requirements from the above listed authorities.



Wyoming Department of Health
 Public Health Division
 Community Services Program
COVID-19 Affidavit of Eligibility
Attachment A

Name		Date of Assistance	
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Individual		Family	
Gender:		Household Type:	
Age:		Household Size:	
Education Level:		# of Household Members 18+:	
Disconnected Youth:		Housing:	
Health:		Level of Household Income:	
Ethnicity/Race:		Sources of Household Income:	
Military Status:		Other Income Source:	
Work Status:		Non-Cash Benefits:	

By signing this statement, I am certifying that I am applying for assistance from a Community Services Block Grant (CSBG) funded agency and have no documented proof of income and I am eligible to receive services, as my household is at or below 200% of the Federal Poverty Level, due to the impacts of COVID-19. I further certify that the documentation provided and the facts contained in this application are accurate and true to the best of my knowledge and understand that falsified statements on this application or in the documentation provided could result in being denied CSBG-funded assistance in Wyoming.

 Applicant Signature

 Date

 Staff Signature

 Date

**Information Memorandum-CSP-2020-01: FY2020 Client Eligibility
Attachment B**

Dated: April 15, 2020

To: Community Services Block Grant (CSBG) Grantees

From: Community Services Program (CSP)

Reference: CSP-IM-2020-01: FY2020 Client Eligibility

FY2020 Client Eligibility

This Information Memorandum (IM) provides guidance to the Wyoming Community Services Program (CSP) Grantees and Sub-Grantees to increase the client eligibility criteria during the Coronavirus Disease pandemic and for the responses to such thereafter. The information and procedures contained in this IM will ascend those contained in CSP Policy #1: Financial Eligibility and Verification until further notice.

The Coronavirus Aid, Relief, and Economic Security Act (CARES Act), which covers both FY2020 regular CSBG and CARES Act supplemental funding, provides

“That for services furnished under such Act during fiscal years 2020 and 2021, States may apply the last sentence of section 673(2) of such Act by substituting “200 percent” for “125 percent””.

In response to the COVID-19 emergency, the CSP is electing to substitute the current 125% Federal Poverty Level (FPL) requirement in the CSP Policy #1: Financial Eligibility and Verification and the Wyoming CSBG Guidance Manual with the newly allowed 200% FPL for FY2020 CSBG Funds (regular allocation and CARES Act supplemental funds). In addition, for the duration of this public health emergency, economic stimulus payments are no longer required to be counted as income when evaluating client eligibility and FPL.

Verification

In accordance with CSBG Information Memorandum #154: Disaster Flexibilities and Waivers, the CSP is allowing for the use of the COVID-19 Affidavit of Eligibility form, for services providing the following:

- Food pantry/meals
- Medical supplies/prescriptions
- Household/hygiene products
- Clothing

Anyone receiving services supported by CSBG funds must not have an income that exceeds 200% of the Federal Poverty Level, and there must be documented proof of income for the past 30 days, unless providing services consistent with the use of the COVID-19 Affidavit of Eligibility form. Income should be verified at the time of the initial application for CSBG services. The verification

must indicate the client's income and source(s) of income at the time of the application. Short-term clients whose cases are closed, and then reopened again for CSBG services at a later date, must have their income verified again at the time of reapplication. Proof of income documentation must be in the file of each person served through CSBG funding. This documentation must also be uploaded into the state supported CSBG CAP60 database.