



Coronavirus Aid, Relief, and Economic Security Act (CARES Act) CSBG
Supplemental
Frequently Asked Questions – FAQs

- 1. Do we have to hold a public meeting for the CARES Act Funds before applying on behalf of our service area?**
No, you do not have to hold a public meeting for the CARES Act funds. However, you are able to do so if you are seeking more community input, wanting to sub-grant to new agencies, or have a Tripartite Board policy that would require such.

- 2. Do we need to submit applications of our Sub-Grantees?**
No, Sub-Grantee applications are not a requirement for the CARES Act Application. However, you will need input from them regarding what services they are providing, what needs are being met, and their proposed budget. Grantees may choose to create their own Sub-Grantee CARES Act application, or just connect via phone, email, etc. to gather this information to complete the Grantee application. Further, you will be required to submit your contracts, agreements, etc. with CSP of all Sub-Grants with the CARES Act funds.

- 3. Will we be allowed to reallocate up to 30% of our total allocation of CARES Act funds versus the current 20% requirement?**
Yes, the CARES Act Contract Statement of Work that we are working on will state that Grantees can reallocate up to 30% of their total allocation for the duration of the CARES Act funds. Anything beyond 30% will need a contract amendment to increase that.

- 4. Can we fund new agencies that aren't currently Sub-Grantees with the regular allocations?**
Yes, you can fund new agencies as Sub-Grantees of the CARES Act funds. If funding a new Sub-Grantee, please ensure that they will be providing a service that meets a need identified in the COVID-19 Community Needs Assessment Addendum.

- 5. What will the Federal Poverty Level (FPL) be for the CARES Act funds?**
The FPL for the CARES Act funds will be 200%. The FPL for the remainder of this current FY2020, as well as for the upcoming FY2021 will also be 200%.

- 6. For either the FFY 2021 grant or the CARES Act Supplemental, is there a proof of US residency/legal status requirement for applicants?**
No, neither the CSBG Act nor the Wyoming Community Services Program requires proof of residency/legal status as an eligibility requirement to receive services. In fact, there is a prohibition of denying services based on one's immigration/legal status from our federal awarding agency. CSBG Information Memorandum #30 states "non-citizens,

regardless of their alien status, should not be banned from CSBG programs based solely on their alien status unless the exclusion is authorized by another statute.” The CSP does not have another statute that would authorize this.

In terms of residency requirements for the county/service area, CSP does not have a policy on this. If the agency has a policy that states only participants who reside in the county are eligible to receive services that is okay. However, I encourage agencies who hold such policies to consider the barriers that may or may not exist with these in place.

7. Can we use FY20, FY21, and CARES Act funds to pay for an individual’s or family’s Consolidated Omnibus Budget Reconciliation Act (COBRA) insurance?

There is no prohibition from the CSBG Act, other federal awarding agency memorandums, or the federal Office of Management and Budget that would restrict the use of CSBG funds to pay for program participants’ COBRA insurance. This would be a reasonable and allocable charge to CSBG if your agency chooses to provide such a service.