

**Community Services Block Grant (CSBG) CARES Funds Approach and Spending Plan**

El Paso County will receive CSBG CARES funding through the State of Colorado Department of Local Affairs (DOLA). The purpose of this plan to propose some ideas on how the money can be expended to assist El Paso County citizens during the current financial hardships some are experiencing due to the COVID-19 outbreak, while attempting to keep the administrative burden as minimal as possible.

CSBG is administered by the Department of Human Services (DHS). This plan is operating on the premise that DHS is responsible for administering the CSBG CARES funding. It is estimated that this funding could be used to serve between 400 – 800 households, based on distribution.

**Considerations:**

Amount of award is \$837,708 (per memo COCSBG-IM-2020-3, dated 5/22/2020). Funds are pending issuance by DOLA. The funds are 100% federal, pass through the State, with no match requirement.

Funds will be added to existing CSBG contract however they must be tracked and reported on separately. The current contract L18CSBG16 (CFDA 93.569) covers the period January 1, 2018 – December 31, 2020. CARES funds must be expended by September 30, 2022. An assumption has been made that unspent CARES funds will be reissued under the new regular CSBG contract scheduled to begin on January 1, 2020.

Expanded income eligibility of 200% of the Federal Poverty Level (per household). This expansion no longer limits CSBG eligibility to just low-income earners; it expands it into the lower end of the mid-range income earners.

**Poverty Guidelines, all states (except Alaska and Hawaii)**

<b>Household/ Family Size</b>	<b>*100%*</b>	Regular CSBG	CARES CSBG
		<b>125%</b>	<b>200%</b>
<b>1</b>	\$12,760	15,950	25,520
<b>2</b>	\$17,240	21,550	34,480
<b>3</b>	\$21,720	27,150	43,440
<b>4</b>	\$26,200	32,750	52,400
<b>5</b>	\$30,680	38,350	61,360
<b>6</b>	\$35,160	43,950	70,320
<b>7</b>	\$39,640	49,550	79,280
<b>8</b>	\$44,120	55,150	88,240
<b>9</b>	\$48,600	60,750	97,200
<b>10</b>	\$53,080	66,350	106,160

Median income for El Paso County is \$65,334 and per capita income is \$32,348 (2018 data from U.S. Census Bureau).

Eligibility is determined based on household income and size. For the El Paso County CSBG program all adult household members must be lawfully present in the United States of America in order for the household to receive assistance utilizing CSBG funds.

The Federal CSBG strongly encourages that whatever program/s are implemented are done so with the support and full involvement of the CSBG Advisory Board. This includes identifying community needs and planning.

DHS will hire a part-time employee to work solely on CSBG activities (CARES and regular) which will be charged as a direct cost to the CSBG awarded funds and the county will also draw down a 10% de minimus that EPC can claim against the CSBG regular and CSBG CARES.

Approach:

The current contract was unilaterally amended by State to allow the County to provide services under all categories (referred to as “domains”) of CSBG; the eligible expenses are no longer limited to the domains that were requested and approved in the 2017 application that was submitted by the County.

Original domains:

- Employment
- Education and Cognitive Development
- Housing
- Health and Social/Behavioral Development (including Nutrition)
- Services Supporting Multiple Domains

Expanded domains:

- Employment
- Education and Cognitive Development
- Income, Infrastructure, and Asset Building \*
- Housing
- Health and Social/Behavioral Development (including Nutrition)
- Civic Engagement and Community Involvement \*
- Services Supporting Multiple Domains
- Linkages (e.g. Partnership that support multiple domains) \*
- Agency Capacity Building \*
- Other (e.g. emergency management/disaster relief) \*

\*Domains not included or awarded in the original application

With these changes, the State offered counties the opportunity to modify their regular CSBG program to expand into these categories. It is recommended that EPC does not change the regular CSBG program through December 2020 and utilize the CARES funds to provide emergency management/disaster relief assistance. The reasoning for this is two-fold – the existing services were selected through a Request for Proposal (RFP) process, and most of the supports are non-emergency in nature. This means the training programs can be utilized for citizens that could benefit from additional certifications or retraining into a new career field due to COVID-19 fueled changes.

The proposed goal is to expend all CARES funds by September 2021 and prepare the county for the audit that is anticipated after the program ends in 2022. In 2009 when ARRA funds were issued through the CSBG network, the State conducted a 100% audit on client files and expenditures. It would be wise to prepare for the same level of review for CARES funding.

Once the CARES funding is accepted by the BoCC, a RFP should be issued to secure contracted partners to provide the services to the community. Ideally, in order to streamline efficiency and limit the opportunity for inappropriate access to funds at multiple locations, contracts should only be awarded to a small number of agencies and for very specific services. Limiting the number of contracted partner agencies will reduce the likelihood of a citizen going to an agency only to find they have expended their CSBG funding allocation and have no funding left to provide assistance. Additionally, it will allow the DHS grant program staff to focus their efforts regarding monitoring, auditing, and policy and program compliance.

It is likely that the contracted partner agencies will need to utilize some of the funds to cover the cost of their staff issuing the funds to citizens. Agencies should address this in their response to the RFP.

There are several approaches that could be taken.

Approach/Idea	Pro	Con
Each contracted partner only provides one type of assistance	Reduce people shopping around and receiving assistance for the same service from multiple agencies, or on an ongoing basis	People who need help with more than one type of service must go to multiple agencies
	Streamline of demographic data collection by service	The same household may be counted more than once across the program if they receive more than one type of assistance, as each agency must report demographic data for the clients they serve and we have no way of cross referencing the recipients
Contracting with providers to serve citizens from specific zip codes	Ability for provider to target the assistance to the need of their area	People may not be aware of which agency in their area is contracted to assist them and may waste resources going to an agency that is unable to assist them
	Reduce people shopping around and receiving multiple assistance as there is only one contracted agency to serve their zip code	
Contracting with 4 providers based on geographical location - TriLakes to north County line, City of COS to west County line, Southern Springs to south County line, Falcon outwards east to east County line	Streamline of demographic data collection per household	People may not be aware of which agency in their area is contracted to assist them and may waste resources going to an agency that is unable to assist them
	Reduce people shopping around and receiving multiple assistance as there is only one contracted agency to serve their geographical region	

Proposed Assistance:

Pikes Peak United Way provided data for the calls coming into the 211-information line. For the period March 16 – April 28, 2020, the following inquiries were received (2,346 inquiries)



While this data is only a 6-week snapshot of need, 72.64% of inquiries were regarding utilities, food, and housing. This snapshot does represent current need in the community and identifies the items at the forefront of a citizen’s concern.

Under this proposal, services will be funded under the domain “Other (e.g. emergency management/disaster relief)”. Through this category a very broad range of services and payment options are available. It is recommended that EPC does not implement the approach of providing citizens with cash or gift card payments under this program. A program with defined requirements of what documentation is needed to verify eligibility and need will be able to withstand the scrutiny of an audit.

Outcomes will be aligned with the Federal National Performance Indicators (FNPI). The services identified below are proposed for CARES funding and are identified to a FNPI.

Supported Activity	Limit per Household	Method of Payment	Outcome	Method of Obtaining Outcome Data
Mortgage payment	\$1,500	Agency to lender	FNPI 4f The number of households who avoided foreclosure.	Contractor follow-up 90 days after assistance to see if household is in 1) same accommodation or 2) different accommodation but not due to foreclosure
Rent payment	\$1,500	Agency to landlord	FNPI 4e The number of households who avoided eviction.	Contractor follow-up 90 days after assistance to see if household is in 1) same accommodation or 2) different accommodation but not due to eviction
Utility payment (other payment sources such as LEAP, Lighten the Load and COPE or similar programs must have	\$750	Agency to utility company or utility vendor	FNPI 4z.1 The number of households who avoid utility shut-off.	Contractor follow-up 90 days after assistance to see if 1) utilities are still connected or 2)current on utility payments or payment plan
Insurance premium payment	\$500	Agency to insurance company or broker	FNPI 4z.2 The number of households who maintain insurance coverage	Contractor follow-up 90 days after assistance to see if 1) citizen has maintained insurance coverage as needed for their situation or 2)current on insurance premium payments

While there are potentially many needs in the El Paso County community, focusing the assistance on a few identified needs will streamline and simplify the outreach and messaging that will need to occur regarding where a citizen can go for a particular type of assistance and assist the County with data and outcome reporting. It is recommended that a dollar limit be determined per household in order to attempt to assist as many households as possible with this funding. The recommended limit is \$1,500 per household; however, this does not mean that the contracted partner agency should offer this full amount upfront to the citizen applicant, the amount paid should be determined based on documented need. Assistance may be provided up to the overall limit of \$1,500 by providing one supported activity or a combination of service activities. As with many programs, the needs must be evidenced by some documentation.

Contracted partners must complete the intake and eligibility process as required by CSBG. Documentation evidencing need is required, such as overdue notice, shutoff notice, or other notice of deficiency. Alternatively, if a citizen applicant can show the mortgage is due in a week and they have no source of income, this assistance could be accessed in advance of the due date. While this is not a regular approach in CSBG, as long as the agency feels confident the information presented to them is valid, they could approve the payment.

*Possible hurdle:* Traditionally, many non-profit in El Paso County set limits on how much assistance they will provide for a certain need. For example, if a citizen has a need for rent assistance and the rent is \$1,000, the agency will offer to pay \$400 or \$500 and require the citizen to come up with the rest themselves. While there is nothing wrong with this approach it may not be the most effective in the financial climate. A better approach to address the need and assist the citizen to move forward may be to provide a one-time assistance in the full amount of the request – pay \$1,000 in rent to the landlord and relieve the citizen completely of that specific burden and enable them to move forward with one less immediate concern, effectively moving that debt to a clean slate. This would require some communication with the contacted partners that this is allowable and encouraged.

#### Next Steps:

Resolution before the BoCC to accept the unilateral contract changes from DOLA

Resolution to accept CARES funding (shortly after notice of award is received from DOLA)

Collaborate with the Advisory Board to recommend an approach to fund distribution. Obtain support from BoCC, County Administrator, and DHS Executive Director

Update El Paso County Community Action Plan and submit it to DOLA

Update CSBG policy to address eligibility and documentation needs for utilizing CARES funding

Hire DHS part-time employee to work on CSBG (training and oversight provided by DHS Contracts and Internal Compliance Manager)

Work with procurement to conduct the RFP process

Collaborate with the Colorado Community Action Agency and DOLA to establish outcome targets

Prepare new, and update existing, CSBG forms regarding data and reporting

Notify DHS staff and community partners of the program and how to share this information in the community

Develop social media (Facebook) outreach utilizing the geo-parameters available (minor cost)

Request the local television networks cover this program on their websites and/or local community television programs to reach a wider audience than the traditional CSBG eligible population

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