

Bureau of Economic Self-Sufficiency Information Memorandum

IM-20-01

PROGRAM(S):	Community Services Block Grant (CSBG) Low-Income Home Energy Assistance Program (LIHEAP) Weatherization Assistance Program (WAP)
SUBJECT:	Guidance and Considerations for Coronavirus Related Operations Impact
EFFECTIVE:	March 16, 2020

Purpose and Objective:

This Memorandum provides guidance to the Florida Community Action Network to prepare for the impact of coronavirus on program operations.

Background:

During emergencies, low-income households are almost always affected disproportionately. A lack of resources limits these families' ability to prepare for and recover from these emergencies. As the novel coronavirus spreads across the country and more Americans contract COVID-19, we can expect that low-income Floridians will be hit especially hard. Helping in times of crisis, meeting emergency needs and assisting with subsequent recovery are key missions of Florida's Community Action Network.

Considering the increasing numbers of confirmed cases, we understand that Florida's Community Action Network may be concerned about a broader outbreak and the impacts on normal business operations.

Take Action to Prepare Your Organization:

The spread of COVID-19 in Florida could impact routines and daily operations. Employers should consider creating or updating their infectious disease outbreak response plan to include:

- Identifying work-related exposure and health risks to employees.
- Reviewing human resources policies to ensure the policies and practices are consistent with public health recommendations.
- Exploring policies and practices for flexible worksites or hours to increase physical distance between employees.
- Identifying essential business functions to maintain operations if interruptions to supply chains or increased absenteeism occur.
- Practicing the necessary measures intended to limit the spread of the virus.

Information Resources:

The following links may prove helpful as you decide how your agency should deal with the effects of COVID-19:

- The Centers for Disease Control and Prevention (CDC) issuing guidance specific to COVID-19 in Florida
- This week, the U.S. Department of Labor released practical guidance for how to prepare workplaces for COVID-19. This guidance will help to educate workers and employers about the COVID-19 outbreak. The guidance can be found <u>here</u>.

• On March 9, 2020, the White House Coronavirus Task Force released practical steps that we recommend posting and sharing to keep workplaces, schools, homes and commercial establishments safe. This information can be found **here**.

Administrative Flexibility:

DEO will rely on the judgement of each CAA's governing bodies and program administrators to determine the most expeditious steps necessary to ensure continuity of services. Flexibility should be considered in the following program operations function areas:

Client Intake Process (CSBG, LIHEAP, WAP):

- Finding creative ways to reach out and serve low-income Floridians is encouraged.
 - A. A Signature Waiver will be allowed with notes in the client's file indicating the circumstances; reference to the Executive Order 20-52 should be annotated (Attachment 'B').
 - B. The following application modes are considered doable and notable practices as alternative to face to face interview:
 - Mail-in application;
 - o Telephone intake; and
 - Online application (if the state or the local agencies have the capability or have an online intake system).
 - NOTE: The FASTRACK Online Application Module can be acquired through Shah Software as an enhancement to the CaseManager-NewGen system and is an allowable budget expenditure through your program. Please reach out to Shah Software if you are interested in this feature.
 - C. For LIHEAP applicants not able to provide full details via phone or mail in an application, additional verification can be obtained through the utility providers.
 - D. Review your organization's policies with respect to clients who come to your agency showing symptoms of illness. Clients should not be denied services due to the coronavirus.

Program Options and Hours of Program Operations:

CAAs may add or reduce hours or days of program operations without obtaining prior approval if the changes can be justified. Notify your program and contract manager via telephone or email of any changes in program operational hours.

WAP Workers in Homes:

Whether or not subrecipient staff should be working in client homes is an agency decision. Federal regulation states that in a shutdown or disaster/crisis, employees can be paid out of federal funds if there are written leave policies approved by the governing board; however, there is no waiver related to direct costs for labor accrued to the Average Cost Per Unit (ACPU) at this time.

Client Eligibility:

Disaster/Crisis-related unemployment may create circumstances where many individuals or families that may not have been eligible for assistance prior to the disaster/crisis may now be eligible. Subrecipients are encouraged to use the following three possible approaches:

- 1. "Presumptive eligibility" determinations are based on unemployment.
- 2. The use of short, signed declarations or affidavits of eligibility.
- 3. Accepting eligibility certification paperwork from another Federal or State program.

Information Memorandum IM-20-01

Benefit Limits:

In any combination, the maximum benefit per household combining both **CSBG** and **LIHEAP** programs is \$2,000. This limit applies to emergency-related benefits per household for expenses incurred because of the Coronavirus. Benefits provided under this guidance do not waive eligibility criteria.

- Example 1: A client that receives \$600 in LIHEAP services can eligible for up to \$1,400 under the CSBG program.
- Example 2: A client that receives Home Energy and Crisis benefits of \$1,000 can be eligible for up to \$1,000 in additional funds under the CSBG program.
- Example 3: If the agency has only LIHEAP or only CSBG, the agency assisting clients with LIHEAP funds notates on the client notes how much additional funds can be authorized under CSBG program -or- the agency assisting clients with CSBG funds notates on the client notes how much additional funds can be authorized under LIHEAP program. The agency must advise the client of the contact information of the other agency. The combined sum cannot exceed \$2,000 per household.

The maximum **WAP** average cost per unit remains \$7,541.00.

Event-Specific Services:

Eligible services include, but are not limited to:

CSBG	
Emergency Services	
Food Assistance	
Medical Services (screenings; immunizations; medication/prescription; medical supplies)	
Transportation to Medical Services	
Fuel	
Clothing	
Emergency and Permanent Housing Deposit	
Rent/Mortgage Assistance	
Utility Assistance	
LIHEAP	
Utility Assistance	
Utility Reconnection Costs	
Fees Required to Assure Resumption of Services	
WAP	
Reduce Energy Bills by Making Homes More Energy Efficient	

Reporting:

Subrecipients are required to complete the monthly Disaster Services Report (Attachment 'A'), which needs to be submitted to your Grant Manager no later than the twenty-first day of each month. If the twenty-first day of the month falls on a weekend day or holiday, the Disaster Services Report shall be due the next business day.

DEO will be issue further guidance as the situation evolves.

Inquiries:

Debbie Smiley, Chief
Bureau of Economic Self-Sufficiency
Division of Community Development
Florida Department of Economic Opportunity
107 East Madison Street
Caldwell Building, MSC–400
Tallahassee, FL 32399

O: 850-717-8467 F: 850-488-2488

Debbie.Smiley@deo.myflorida.com