

Community Services Block Grant

Dear Colleague Letter

DCL#: CSBG-DCL-2021-07

DATE: January 11, 2021

TO: States, Tribes, and Territories Administering the Community Services

Block Grant (CSBG) Program, Eligible Entities for CSBG Resources

SUBJECT: Use of CSBG Funds to Expand Educational Opportunities

ATTACHMENT(S): N/A

Dear Colleagues,

The purpose of this message is to provide you with an update regarding Executive Order 13969, issued on December 28, 2020. This document provides guidance for both state Community Services Block Grant (CSBG) lead agencies and local eligible entities on providing emergency learning scholarships and other supports to low-income school age students and families impacted by school closure.

The President's Executive Order, Expanding Educational Opportunity through School Choice, addresses the "public health challenges and uncertainties imposed by the COVID-19 pandemic" and the "shut down of in-person learning," which impacts school aged students and families across the country. To address the impact on learning, as directed by the Executive Order, the Secretary of Health and Human Services clarifies and reinforces that, consistent with the CSBG Act, CSBG funds may be used to provide emergency scholarships to low income and disadvantaged students impacted by school closure. If a community needs assessment identifies the need, as outlined in the Executive Order, scholarships may be used for:

- (1) tuition and fees for a private or parochial school;
- (2) homeschool, micro school, or learning-pod costs;
- (3) special education and related services, including therapies; or
- (4) tutoring or remedial education.

The CSBG Act states that the overarching purpose of CSBG is "to provide assistance to States and local communities, working through a network of community action agencies and other neighborhood-based organizations, for the reduction of poverty, the revitalization of low-income communities, and the empowerment of low-income families and individuals in rural and urban areas to become fully self-sufficient." 42 U.S.C. § 9901(1). The statute further directs that this purpose shall be achieved through a broad array of "innovative and effective community-based approaches to attacking the causes and effects of poverty and of community breakdown." Id. at § 9901(2)(C).

CSBG local eligible entities play a critical role in supporting low-income school-aged and disadvantaged students and families. These local eligible entities have the authority to use CSBG regularly appropriated funding and CSBG CARES Act supplemental funding to address the educational needs of disadvantaged school-aged youth and families affected by school closures in response to the Executive Order, if such a need is identified in a given community needs assessment. A community needs assessment establishes a profile of a community, to include needs as well as resources, which in turn help determine an eligible entity's strategies and goals.

CSBG eligible entities are required to conduct an assessment of community needs at least every 3 years and can update it based upon any identified changes within a given community. Where appropriate, CSBG eligible entities may support directly or may offer additional supports for scholarships and other supports to school-aged, disadvantaged and low-income students outlined in the Executive Order. Eligible entities report annually on their strategies and services and may include the related strategies outlined in the Executive Order as appropriate. This reporting could include expenditures, the capacity and resources towards their programming, as well as individual, family, and community-level data. For situations where there is a determined local need, the respective state office is required to include this information in its regular CSBG reporting process.

States must also provide an assurance that CSBG funds will be used to enable low-income families and individuals to meet a variety of goals including "to attain an adequate education" and to "address the needs of youth in low-income communities through youth development programs." 42 U.S.C. § 9908(b)(1). The income guidelines for CSBG have been increased to 200 percent of the federal poverty level, in response to COVID-19, for FY 2020 and FY 2021. The link between education and poverty reduction is well-established and, thus, the broad purposes of the CSBG Act establish the necessary authority for states and eligible entities, if they choose and if their local community needs assessment reflects such a need, to support the emergency learning scholarships envisioned by the Executive Order.

Local eligible entities that receive CSBG funds have a long history of addressing the educational needs of disadvantaged, school-aged youth. We know the CSBG Network – at the federal, state, and local levels – recognizes that low income and disadvantaged school-aged students have been negatively impacted by prolonged school closures and many students are not meeting their educational milestones. The impact to low income, minority students and children with

disabilities is even more devastating, as virtual learning may not sufficiently meet their educational needs.

The Office of Community Services, within the Administration for Children and Families, is committed to ongoing partnership with state CSBG lead agencies, eligible entities, and other agencies to address the unique and widespread impacts of this national emergency. Please reach out to your CSBG Program Specialist for additional information and guidance.

Thank you for your attention to these matters. OCS looks forward to continuing to provide high quality services to OCS grantees.

/s/ Charisse Johnson Director, Division of Community Assistance Office of Community Services