
Community Services Block Grant

Information Memorandum

U.S. Department of Health and Human Services
Administration for Children and Families
Office of Community Services
Division of Community Assistance
330 C Street, Southwest, 5th Floor
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TO: Community Services Block Grant (CSBG) state officials and program contacts in areas affected by the 2017 hurricanes and related recovery efforts

SUBJECT: Disaster Recovery and CSBG

PURPOSE: This guidance provides details on CSBG flexibilities and waivers authorities in major disasters.

RELATED

REFERENCES: Community Services Block Grant Act (Public Law 105-285, the Community Opportunities, Accountability, and Training and Educational Services Act of 1998), CSBG Information Memorandum (IM) 90 and CSBG IM 91

INTRODUCTION

This guidance document provides both intermediate and long-term suggestions for state CSBG lead agencies and eligible entities to facilitate the recovery efforts from major disasters, including recovery from physical damage and services to people who have experienced displacement or loss as a result of disasters. The Office of Community Services (OCS), within the Administration for Children and Families (ACF), is committed to ongoing partnership with state CSBG lead agencies, eligible entities and other agencies involved in major disaster recovery efforts to address critical needs people with low-income consistent with the purpose and allowable uses of CSBG funding.

CSBG eligible entities – more commonly known as Community Action Agencies (CAAs) – can serve a critical role in serving low-income individuals and families in communities before and after major disasters. To help assure an efficient response to community needs, OCS supports state and community efforts to include CAAs in planning for disasters, and removing barriers to recovery in response to disasters. At all levels of the CSBG network, a critical goal is to meet the needs of all low-income individuals and families, including those with disabilities, seniors, families affected by disasters (including newly-homeless and displaced children and families), those without access to fresh food, potable water, or other immediate family needs, and parents experiencing a loss of income in the aftermath and recovery.

OCS places a high priority on helping CSBG-funded agencies to resume existing services where appropriate, and to modify existing Community Action Plans where necessary to free resources to meet urgent priorities.

INVOLVEMENT IN IMMEDIATE RELIEF EFFORTS

Examples of areas of priority support may include the following:

- ***Central Point of Services*** – In many communities, eligible entities have historically served as a central point for community-based services. These agencies have the ability to tap into community partnerships and resources to support other relief efforts, as well as reaching low-income people, such as people in areas of concentrated poverty, people who may lack transportation to access emergency and short-term recovery supports, and others who may not otherwise have access to immediate services. Using CSBG and other resources, states and eligible entities are encouraged to support families in accessing local, state, and federal relief, including exercising the inherent block grant flexibility to redress imminent emergency needs.
- ***Access to Facilities for Urgent Needs*** – CSBG-funded agencies that have operable facilities may support supervised access to those facilities, including kitchens, rest/napping areas, computer labs, bathrooms, laundry, and power sources for re-charging phones and other communication devices.
- ***Connection and Referral*** – Even if some facilities are inoperable or compromised for immediate support services, program staff can support families in meeting their basic needs, including nutrition, health and mental health support, and in sharing information regarding alternative or supplementary non-government organization (NGO) providers and non-profit organizations for immediate aid.

ADMINISTRATIVE FLEXIBILITY

While CSBG funds may not be used for the repair or permanent improvements to property, Section 678F(a)(2) of the CSBG Act allows the Secretary of the Department of Health and Human Services (HHS) to waive restrictions on the use of CSBG funds for purchase or improvement of land, or the purchase, construction, or permanent improvement of property in extraordinary circumstances if doing so will contribute to the ability of the state to carry out the purposes of the grant.

OCS will consider and expedite responses to waiver requests for emergency repairs for service facilities directly impacted by a disaster that are not covered by other federal disaster assistance or other sources such as property insurance. The responsible state CSBG official must submit a waiver request signed by the state CSBG Authorizing Official and addressed to the Secretary of HHS with attention to the Director of OCS describing the extraordinary circumstances that justify the waiver. The request must explain how the waiver will contribute to the state's ability to meet and carry out the purposes of the CSBG program in the disaster circumstances.

Prior to submission of a waiver request, state CSBG lead agencies should assist CSBG eligible entities in accessing all other available sources of support for these needs. For repair, renovation and/or rebuilding requests, states must also establish procedures for verifying that costs associated with these activities are not reimbursable through the Federal Emergency Management Agency (FEMA) disaster assistance, under a contract for insurance, or covered by self-insurance. Use of CSBG funds for repair, rebuilding, and/or reconstruction of facilities creates a reversionary federal interest in the property, and requirements for a notice of federal interest will be included in a waiver approval.

ELIGIBILITY DETERMINATION

Section 673(2) of the CSBG Act specifies that the Federal Poverty Line shall be used as a criterion of eligibility in CSBG and that the state may revise the poverty line to not exceed 125 percent of the official poverty line. While no federal waiver exists for this requirement, states have substantial discretion in defining the procedures for determining if an individual or family meets the requirements, including the timeframes for review and necessary documentation appropriate to the services or strategies being implemented.

In a disaster, states may consider circumstances where individuals may have been made low-income by the disaster, including disaster-related unemployment, and may establish appropriate procedures based on individual and family needs. States are encouraged to review existing procedures and establish emergency procedures if appropriate to streamline the eligibility determination process following a disaster. If a displaced individual or family does not have the eligibility documentation in-hand, emergency procedures may include flexibility in accepting signed statements from the family attesting to necessary eligibility information pending availability of necessary documents to meet immediate emergency needs.

HEALTH AND MENTAL HEALTH NEEDS

Children, families, and social services staff may experience stress and even trauma related to a hurricane or other disaster. Mental health effects can be short-term or long-term. Responses may vary by the individual. Grantees are encouraged to work with local agencies and partners to support health and mental health services.

The following resources are available, at no cost, to assist programs in responding to the 2017 hurricanes and aftermath, as well as preparing for any future emergencies.

- **Coping with Disaster** is a series of tip sheets for adults and children on recognizing stress from an emergency and information on how to address the emotional effects of the event. The weblink for these tip sheets is provided below:
<https://www.fema.gov/coping-disaster>.
- **Psychological First Aid** is an evidence-informed approach for assisting children, adolescents, adults, and families in the aftermath of disaster. The field manual includes handouts for parents, caregivers, as well as children from birth to 5-years-

old. The weblink for these materials is provided below:
<http://www.nctsn.org/content/psychological-first-aid>.

FUNDING

Although additional funding is not available within CSBG appropriations, additional federal funding may be available through disaster supplemental appropriations to support eligible entity services in some rare instances. Within existing allocations, state CSBG funding may be used to support disaster response, as long as it aligns with the statutory allowable activities. State CSBG-designated organizations do not have to request a federal waiver to utilize their existing CSBG funding to support disaster response and assistance to eligible low-income individuals and families.

OCS RESPONSIBILITIES AND NEXT STEPS

OCS recognizes the commitment and dedication of program staff across the country. In some instances, state and local CSBG staff members responsible for providing community services are personally affected by the recent hurricanes. ACF and OCS will assist and support states and eligible entities in every way possible as they take part in critical human services relief efforts. OCS truly appreciates the great need for flexibility as eligible entities provide essential services to low-income individuals and families during times of recovery and need.

TECHNICAL ASSISTANCE CONSULTATION

CSBG program staff at the Division of Community Assistance (DCA), as well as CSBG national partners, will be available to states for training and technical assistance or questions regarding administrative flexibility and waiver requests for emergency repairs for service facilities directly impacted by a disaster that are not covered by other federal disaster assistance or other sources such as property insurance. If agencies encounter other barriers to responding to low income individuals and families, aside from those included in this IM, please contact program specialists to arrange for consultation calls with OCS leadership resolve those barriers.

For consultations, state officials should contact their CSBG analyst, found here:
<https://www.acf.hhs.gov/ocs/resource/csbg-staff-assignments-by-region>.

Please feel empowered to reach out to your program specialist so that we may assist you to meet our shared interest in a strong community recovery from the recent hurricane destruction.

Sincerely,

/s/

J. Janelle George
Acting Director
Office of Community Services