

# Texas Department of Housing and Community Affairs

## COVID-19 Frequently Asked Questions

*Updated March 8, 2021*

The Texas Department of Housing and Community Affairs (The Department) has created the following document to assist its Subrecipients to answer applicable program questions. The document contains answers to the questions the Department has received related to COVID-19 and associated webinars.

If after reading and referencing all these materials you still have questions, you may submit a program question by completing this form: <https://tdhca.wufoo.com/forms/request-for-ca-program-assistance/>

You may click on the hyperlinks below to move to the most appropriate category that applies to your question.

### Table of Contents

I.	DEPARTMENT APPROVED FLEXIBILITIES .....	2
A.	Client Signature Flexibility Form.....	2
B.	Citizenship Self-Certification Form .....	2
C.	CEAP: Two (2) Fuel Payments.....	3
D.	CEAP/WAP: Reobligation/Deobligation Targets.....	4
E.	Board Vacancy Period.....	4
F.	WAP Contractor Payment for Work Completed .....	4
G.	Income Exclusions .....	4
II.	GENERAL.....	5
III.	CEAP .....	7
IV.	CSBG .....	8
V.	WAP .....	13
VI.	BOARDS .....	15
VII.	REPORTING .....	15

# Texas Department of Housing and Community Affairs

## COVID-19 Frequently Asked Questions

Updated March 8, 2021

### I. DEPARTMENT APPROVED FLEXIBILITIES

#### A. Client Signature Flexibility Form

*For use in taking phone applications for documents where the client signature/date must be obtained on a form. Form examples:*

- *Applicant signature/date on the application,*
- *Household Status Verification or*
- *Declaration of Income Statement (DIS)*
  - **DOE-WAP: Clients may self-certify income and specify a notarized statement will be provided at a later date. Notarized DIS must be obtained for monitoring.**

##### 1. What is the effective date for flexibilities?

Flexibilities effective date is 3/27/2020, except for the Citizenship Self-Certification Form which is effective 4/7/2020. All flexibilities will remain in effect until rescinded by the Department.

##### 2. Is the Signature Form only for CEAP? Is it only for crisis payments?

No, this applies to any program application, a DIS, or HH Status Verification Form that needs a signature, as well.

##### 3. If able, can we obtain digital signatures, are these allowable?

Yes, digital/electronic signatures are allowable.

#### B. Citizenship Self-Certification Form

*For use only when U.S. Citizenship documentation is unobtainable between April 7, 2020 until rescinded by the Department.*

##### 4. What can we do about the legal documents that are required to prove citizenship? We have many clients that do not want to send that information because they are scared of fraud. Can the DEPT please allow self-certification for proving citizenship? Our local clerk's office are closed to the public, request for birth certificates have to be completed online then mailed in.

Effective 4/7/2020, for citizens who cannot provide proof of citizenship due to record office closure, the use of the Citizenship Self-Certification Form may be used. Once records offices reopen clients are to provide their citizenship document for the client file.

##### 5. If we know that the birth certificate record offices are now open in our service area, can we still use the citizenship self-certification form, since it has not been rescinded?

No, this form is ONLY for use when the client cannot obtain their birth certificate due to record office closures. It is not to be used, if the records offices are open.

##### 6. Is the Citizenship Self-Certification flexibility for CEAP only? Is it for new applicants (eligible to use this allowance) or for new and current applicants?

This form may be used by CEAP and WAP. It is for applications dated as of 4/7/2020, for those who are unable to obtain their birth record due to COVID-19 record office shut downs.

# Texas Department of Housing and Community Affairs

## COVID-19 Frequently Asked Questions

Updated March 8, 2021

- 7. How do we get Citizenship Self-Certification form from clients who do not have the technology or means of submitting a signed form? Can we use the signature flexibility? If not, this doesn't make sense.**

Yes, use the Client Signature Flexibility Form in tandem with the Self-Certification Form and document the file of their verbal attestation.

- 8. Does this apply to those who have been issued birth certs in the past? What about elderly people born at home, who have never had a cert issued? Can this flexibility be used for them?**

NO---if you have previously certified the client, use a copy of that certification form. If they have a birth certificate, they must provide it. This only applies for those who are unable to obtain their birth record due to COVID-19 closures---and is only for the duration of flexibility, which remains until rescinded by the Department.

- 9. Why can't we use the Texas DL with the gold star? Doesn't it verify that the TX DPS verified citizenship?**

Unfortunately, it does not. A person can be eligible under the REAL ID ACT and not be a Qualified Alien under PRWORA (e.g. persons that have conditional permanent resident status, temporary legal status, freely associated states citizens). Likewise certain categories of persons may not be eligible for REAL ID, but are Qualified Aliens eligible for LIHEAP/WAP benefits (e.g. certain individuals with VAWA status).

<https://www.govinfo.gov/content/pkg/FR-2008-01-29/html/08-140.htm>

<https://www.law.cornell.edu/uscode/text/8/1641>

- 10. If a client applied before 4/7, and we are processing the file as of 4/7 or after, and they cannot obtain their birth certificate due to office closure, does the approved flexibility apply to them too?**

Yes, you will need to obtain a self-certification form from them, and update the file.

- 11. If social distancing/isolation/closures last longer than August would the Department be willing to extend the flexibility period?**

Due to COVID exceeding originally anticipated time frames, flexibilities will remain in effect until rescinded by the Department.

### **C. CEAP: Two (2) Fuel Payments**

***For 2020 Program Year, two (2) utility bills (electric, propane, or gas) may be paid each month until rescinded by the Department, effective 3/27/2020. Keep in mind that the assistance provided must still stay within the maximum benefit allowance.***

- 12. Can we go back to March and add the second fuel payment?**

You may not go back and add a second fuel payment to months that have already been paid. You may add the second fuel payment to any months that have not been paid or that are pledged, as long as you remain within the maximum benefit allowance for the household.

# Texas Department of Housing and Community Affairs

## COVID-19 Frequently Asked Questions

Updated March 8, 2021

### 13. So, if a household is eligible for 6 payments and we pay 2 fuel payments a month, does that mean we can only do 3 months?

Each eligible payment can contain both bills. Here's an example for a household who is eligible for 6 payments with a max benefit allowance of up to \$1,400.

Month	Electric Amount	Gas Amount	Considered as Payment Number
June	\$185	\$30	1
July	\$200	\$30	2
August	\$250	\$25	3
September	\$175	\$35	4
October	\$100	\$40	5
November	\$85	\$50	Skip, as Dec is higher- pledged for max assistance
December	\$80	\$75	6
<b>Total</b>	\$990	\$235	\$1,225 within max benefit allowance

### D. CEAP/WAP: Reobligation/Deobligation Targets

#### *Suspension of expenditure and production targets for 2020*

### 14. Is there any additional documentation required from Subrecipients for the Deob/Reob waiver?

The deobligation triggers have been waived; however, Subrecipients should still develop a plan for full expenditures of all funds and tracking progress to ensure they meet full expenditure.

### E. Board Vacancy Period

#### *Extension of 90 day requirement to fill vacancies.*

### 15. We are unable to hold elections for vacant board seats. Can we get an extension to the 90 day rule in 10 TAC 6.212 (b)(1)?

Yes. The Department approves a delay until it is reasonable/safe to conduct elections of board members. Please document dates and conditions for when you are able to hold the elections and seat board members for future monitoring.

### F. WAP Contractor Payment for Work Completed

#### *Subrecipients may pay contractors for work completed due to delays from COVID-19.*

### 16. Our contract states that we not pay our contractors until a final inspection is signed off from the agency.

If unable to perform a final inspection due to COVID-19, you may pay your contractor for work performed, with the recommendation to hold back a small percentage until the final inspection can be completed. The unit may not be reported as completed until the final inspection is complete; however final inspection and final payment must be conducted during the same contract period as the initial payment to contractor. Units will be reported as in progress prior to final inspection and all payments will clearly document the items being paid for.

### G. Income Exclusions

### 17. Will the Stimulus Checks for COVID-19 be included or excluded income?

COVID Stimulus checks will be considered EXCLUDED income.

# Texas Department of Housing and Community Affairs

## COVID-19 Frequently Asked Questions

Updated March 8, 2021

**18. Will pandemic unemployment assistance (PUA) and disaster unemployment assistance (DUA) be included or excluded income? Does this apply to WAP, as well?**

Both the PUA and DUA will be considered EXCLUDED income for CSBG, CEAP and LIHEAP-WAP. DOE-WAP has issued guidance in WPN 20-3 and Memorandum 062 that PUA and DUA is to be INCLUDED income, as it is not a one-time payment.

## II. GENERAL

**19. What are the parameters that determine whether a household was impacted by COVID19 and what documentation should be collected? Do we need to obtain proof that the household was impacted by COVID-19 in order to provide assistance through the CARES Act?**

Client verbal report of loss of job, income, or need due to sheltering-in-place or local restrictions from COVID-19 that impacts the household, noted in client file by the caseworker. \*See COVID-19-related Sample Questions.

**20. Can a client self-certify they have been impacted by COVID? Our application has a section where the client is asked to check a box if they have been financially impacted by COVID, does this suffice?**

A check-box in and of itself is insufficient. You would need to document in case notes how the client was impacted by COVID-19 as well. If the self-certification has an explanation section, then it could be used.

**21. Are we correct in thinking that a person on social security would not have a COVID-related need since their income was not affected? If anything, they received more money than usual (stimulus check).**

Not necessarily. Income may not be the only factor for a COVID-19 related need. In addition, stimulus checks are "excluded" income. As with any CARES funds, the client must show or explain how COVID-19 has impacted their need for assistance.

**22. Can you provide a letter designating Community Action Agencies as Essential Services so we can use it as backup for our letter staff is carrying?**

No, this is outside of the Department's purview. If you have specific questions about an activity, you should contact your legal counsel and/or you may ask TDEM to have certain functions determined as essential:

<https://tdem.texas.gov/essentialservices/>

GA-14 refers to the Texas Department of Emergency Management (TDEM) and the Department of Homeland Security descriptions of "essential services," found here:

[https://www.cisa.gov/sites/default/files/publications/CISA\\_Guidance\\_on\\_the\\_Essential\\_Critical\\_Infrastructure\\_Workforce\\_Version\\_2.0\\_Updated.pdf](https://www.cisa.gov/sites/default/files/publications/CISA_Guidance_on_the_Essential_Critical_Infrastructure_Workforce_Version_2.0_Updated.pdf)

**23. We do have some elderlies that do not have a copy of their Social security benefits letters. The SSA offices in our location is closed until April 17th and we are not aware if they will be extending. We do try to refer the clients to create an account to print the award letter. Not all agree. May we proceed with a DIS form to avoid having them wait for SSA office to open?**

If unable to obtain their current letter, use a DIS with a copy of the last award letter as backup.

**24. We had a lot of travel for conferences canceled due to COVID-19, some costs were non-refundable, like airline tickets which are now reserved credit. How should we account for these costs?**

Keep the travel invoice, the credit from the airline and the disaster declaration as support. You may use the credit for future travel. TDHCA will not question documented non-refundable travel costs due to COVID-19.

# Texas Department of Housing and Community Affairs

## COVID-19 Frequently Asked Questions

Updated March 8, 2021

- 25. Do you think it may be a good idea to track if people in the network who test positive for COVID-19? It would be important to note what they do such as weatherization assessments or other positions with client contact, no client contact? If it turns out people are getting infected because of client contact we can let the network know of the risk.**

Tracking staff who test positive for COVID-19 is a local level decision. TDHCA recommends using the resources available on the “Community Affairs Subrecipient Guidance during COVID-19 Pandemic” page on our website in conjunction with local health department recommendations in order to establish safe work practices. Any tracking of employee health must be in compliance with HIPAA and any other applicable privacy and public health requirements.

- 26. Can one household be assisted under regular CSBG, CSBG-Discretionary, and CARES Act CSBG/CEAP?**

It is feasible, but may not be prudent.

For CSBG, a regular CSBG client may now have additional COVID-19 related needs. These clients could be served out of regular CSBG and a COVID-19 contract. For clients above 125%, these must be served using the CSBG-D or CSBG CARES contracts with a documented COVID-19 related need.

For CEAP clients, **the benefit allowance is based upon program year (not contract)**. All regular CEAP rules for assistance remain in effect. Those being served out of CEAP CARES contract must have a documented COVID-19 related need and be income eligible. Once you identify which contract is appropriate, you should fully serve the household for the remainder of this program year out of that contract. There is no additional benefit by using both contracts, so DO NOT use both contracts for a household, as this may result in future monitor findings.

- 27. Do COVID applicants need to be run through SAVE?**

No. CSBG clients are not subject to SAVE or Citizenship Verification requirements. Those requirements are only for CEAP, LIHEAP-WAP, and DOE-WAP.

- 28. Can we outsource client intake?**

It is allowable, per CSBG Contract Section 16 A to subcontract for the delivery of direct client assistance. However, for any outsourced activities, the Subrecipient is responsible for oversight of program requirements performed by the outsourced organization. You must also, properly procure for organizations with whom you will outsource.

- 29. How do we handle staffing costs, as we may need to hire?**

If you are hiring temp staff, you will need to properly procure for a temp agency. See question #33 below.

- 30. How do you conduct outreach if you cannot go out?**

Standard outreach methods such as news broadcasts/television PSAs, social media, mailers, and partnerships with local organizations are a few recommendations that do not require person to person contact.

- 31. Do COVID applicants need to be run through SAVE?**

It depends on the program. CSBG clients are not subject to SAVE or Citizenship Verification requirements. SAVE and Citizenship requirements are required for CEAP, LIHEAP-WAP, and DOE-WAP.

- 32. Due to the governor's executive order opening all business at 100%, does this mean the flexibilities will no longer be accepted?**

No. All flexibilities remain in effect until rescinded by the Department. The COVID-19 disaster is still in effect as the Governor has been renewing the declaration monthly and most recently March 6, 2021.

<https://gov.texas.gov/news/post/governor-abbott-extends-covid-19-disaster-declaration-march-2021>

# Texas Department of Housing and Community Affairs

## COVID-19 Frequently Asked Questions

Updated March 8, 2021

### **33. Could you provide clarification for allocation of CARES funds?**

Subrecipients may choose to keep all normal operating costs allocated to their annual allotment of CEAP and CSBG grants. Subrecipients do have (at their discretion) the option to cost allocate across both their annual and CEAP and CSBG CARES Act grants. One key item to keep in mind is that the CARES Act grants are supplemental funding. Additional costs that Subrecipients may incur to administer CARES Act grants, should be charged to the appropriate CARES Act grant.

Things to keep in mind:

- Subrecipients must have a methodology they follow and must retain supporting documentation for all costs
- Temporary Staff: When you are hiring temp staff, you will need to properly procure for a temp agency. If they are only going to work on CARES program, then CARES funds will pay 100% of salary.
- Admin Staff: if they work on both grants, you may choose to allocate their time to reflect activities performed.
- Subrecipients should not randomly charge across grants. Be consist with the methodology put into place for all expenses.

### **III. CEAP**

#### **34. If we have spent the 2019 CEAP contract, can we close that contract out and complete a final report?**

Yes, Subrecipients should close out contracts when completed.

#### **35. Any extensions on reporting and if not can we submit 2 month projections on the next CEAP reports?**

Yes, we can provide extensions, if necessary. Keep in mind that extensions can delay when the funding is received by the Subrecipient, as well.

#### **36. Will CEAP income guidelines increase?**

No, CEAP remains at 150%.

#### **37. Will the CEAP CARES funding guidelines be the same as the current CEAP?**

Yes. All program rules apply.

#### **38. Could we consider waiving consumption histories during this crisis in CEAP**

Subrecipients may offer a one-time assistance, based on current bill, and may include two (2) fuel sources, while awaiting billing histories to determine future pledges. If a billing history is unobtainable or does not cover a full 12 months, the agency approved ABM may be used.

#### **39. If you have already put a client in for the year in CEAP, and they got laid off, they already have their set pledges for the year. How will we be able to assist them for the months that they can't pay due to this crisis?**

Use the standard protocols for unpledged months; apply any remaining crisis component benefits, as long as the crisis conditions exist. See 10 TAC §6.310(a)(1-3).

#### **40. Will any UA money be allocated for small business?**

NO, utility assistance for businesses is not allowable.

# Texas Department of Housing and Community Affairs

## COVID-19 Frequently Asked Questions

Updated March 8, 2021

**41. Are we to assist everyone from today and going forward under the crisis component only or do we have the flexibility to help under UA or Crisis Assistance component?**

Only if they meet the first criteria for Crisis Assistance, as stated in 10 TAC§6.310 (a) Crisis Assistance can be provided to persons who have already lost service or are in immediate danger of losing service only under one of the conditions listed in paragraphs (1) Extreme Weather (2) Disaster or (3) Life Threatening Crisis. Otherwise, use utility assistance.

**42. When using the Citizenship Self-Certification Form, can we pledge all remaining months to utility all at once? Or still one month at a time?**

You may pledge the remaining months. You are to pledge them as you do any other time; one payment per month.

**43. Is a past due utility bill sufficient to count as a disconnect notice?**

Not necessarily. You will need to determine if they are “at risk” of disconnect barring the moratorium. Check with your utility vendor.

**44. What do we need to look for to pay utility bills out of Crisis Assistance funds?**

Crisis Assistance has two components for assistance. 1) Household must be “at risk” of losing service or have lost service AND 2) there must be a weather crisis (as per your CEAP Service Delivery Plan), a disaster (as declared by the Governor or President), or life threatening condition, as outlined in 10 TAC §6.310 (a) (1-3).

**45. Several utility vendors are under a disconnect moratorium, others are not. Can we pay bills under the Crisis Assistance?**

In order to use Crisis Assistance funds, the client must present a “disconnect notice” or “notice of past due amount” during the moratorium, and the state of disaster/crisis must still be in effect. Keep a copy of the disconnect notice/late notice in the file.

**46. Are benefit determinations for CARES CEAP households based on contract term or program year?**

The benefits are to be determined by program year (Jan 1-Dec 31), with an annual application. For 2020 applications, provide benefits through the end of this year or within max benefit determination. For 2021 applications for the CARES CEAP, pledge through contract end (or extension date within 2021, if needed), up to the max benefit allowance.

## IV. CSBG

**47. Will all CSBG contracts align with the CARES Act income eligibility threshold of 200%? Will all CSBG contracts increase to 200% FPL?**

Yes, to align with the CARES grant, any carryover, discretionary, and existing CSBG awards will be increased to 200% FPL, effective 3/27/2020. \*CEAP/LIHEAP-WAP remain at 150%.

**48. Why was the regular CSBG moved to 200% FPL?**

It was determined that all CSBG awards would use the same FPL of 200%. This allows the option to use any regular CSBG emergency funds for COVID clients, if needed. However, the regular CSBG funds should remain prioritized for the goals and purposes of your PY20 CAP. Increase from 125%: Refer to slide 3 of CSBG Network Call on 4/23/2020.



# Texas Department of Housing and Community Affairs

## COVID-19 Frequently Asked Questions

Updated March 8, 2021

### **49. Are there any restrictions regarding households over 125% or for the COVID issued contracts?**

The only restriction is that these household must have a documented COVID-related need. Documentation may be client statements in case notes. If the client can provide backup documents, such as: job loss notice, unemployment, online schooling mandate, this would be best.

### **50. Are we required to have our Matrix pre-approved by TDHCA?**

No, your Matrix is determined at the local-level, based upon identified needs, funding availability, and identified services/outcomes to be achieved.

### **51. How does the FPL increase affect TOP? Will TOP be increased to 200% or remain at 125%?**

In order to maintain the statistical integrity of TOP data, TOP reporting will remain under the rule of 90 consecutive days above 125%FPL. This means that only clients who have a starting income at or below the 125% FPL are eligible for case management toward TOP numbers reported.

### **52. If a client TOPs above 125%, can we still serve them until they reach 200%?**

Clients, who are reported as TOP, can continue to be served through December 31<sup>st</sup> of their application year, if they need additional assistance.

### **53. What about COVID-related job loss clients who need case management for employment?**

If they enter the program at or below 125%, and meet the TOP criteria, you may report these households towards your TOP goal. If they are above 125% at application time, they may receive case management and all related services. You will report the services provided (SRVs), and any outcomes achieved (FNPIs), but you will NOT report these household numbers toward TOP goal.

### **54. What's the time frame until the CSBG-Disc and CSBG-COVID contracts show up?**

The CSBG-Discretionary contracts for COVID-related direct client assistance have been released. The CSBG-CARES contracts are expected to be released around mid-June.

### **55. Under pre-award costs, does that pertain to costs for computers or other costs that are not a direct service? Example, we have to do computer programming for CARES reporting.**

Additional operational costs to effectively administer the CARES Act contracts are allowable pre-award costs. Pre-award costs may include direct client assistance that was provided prior to receipt of contract. Keep clear, detailed documentation. As with any purchases, proper procurement is required.

### **56. Can a person who previously qualified for TOP still get help thru CARES program if they lost their job due to COVID?**

It depends. If this was a previous TOP client, who achieved TOP, and now lost their job due to COVID-19, then yes. If this was a previous TOP client, who had not yet achieved TOP for 90 consecutive days then you should re-enroll in regular CSBG.

### **57. Can technology be purchased for GED students/TOP clients who are in school since they are now studying remotely? Will that suffice as a COVID related need?**

If the technology is needed for the client to continue their education/certification due to classes only being offered remotely, then this could be considered a COVID-19 related need. With that said, proper procurement is required. A laptop or initiation of cell/internet service would require small purchase procurement. If they have existing cell/internet service, you could pay that vendor for the duration of the course.

# Texas Department of Housing and Community Affairs

## COVID-19 Frequently Asked Questions

*Updated March 8, 2021*

**58. So gift cards can't be a \$100 Visa Card which is just like cash? Do the clients need to turn in receipts for purchases with gift cards?**

Pre-loaded Visas Cards are like cash. These are not allowable. You may purchase gift cards for specific needs through local vendors, for such things as: food, essentials, gas. The client file must clearly note the purpose of each gift card. Clients are not required to provide receipts to prove what the card was used for. Agencies who use gift cards must have strong internal controls. Each card must be accounted for and associated with a client need noted in the client file. Gift cards are to be kept in a secure location with strict oversight and good internal controls. Subrecipients should have a clear written policy/procedure developed for gift cards.

**59. Does the CARES ACT cover employees as well? As in rental assistance, food, and gas (fuel)?**

If agency staff meet the eligibility requirements for the programs, then they may be served. However, you will want a written policy or procedure as to how these applicants will be processed. There must be separation of duties (i.e. - application and eligibility determination conducted by a supervisor or non-relative/friend), with Executive Director approval for payment. The staff must be treated and processed like any other applicant and not placed ahead of other clients.

**60. Is there a complete list of COVID-related reasons?**

No, there is not a list as we cannot anticipate the various types of assistance that may be related to COVID-19. This will need to be on a case-by-case basis as to what happened due to COVID-19, that wouldn't have happened if this pandemic didn't occur, that has caused the need.

**61. If a Head Start parent now has to pay for childcare because the Head Start Center is closed, is this a COVID reason?**

Yes.

**62. Would layoffs from the oil fields be a COVID reason?**

Yes, if the layoffs are due to low fuel prices causing the oil companies to reduce production from COVID-19.

**63. What about COVID-related job loss clients who need case management for employment?**

If they enter the program at or below 125%, and meet the TOP criteria, you may report these households towards your TOP goal. If they are above 125% at application time, they may receive case management and all related services. You will report the services provided (SRVs), and any outcomes achieved (FNPIs), but you will NOT report these household numbers toward TOP goal.

**64. To confirm, is mortgage assistance allowed?**

Yes, it is allowable if offered to avoid the household being at risk of homelessness. Your agency should have a clearly outlined Matrix of when this assistance will be offered: risk condition, how many times and for how much. It is recommended to set a dollar threshold per month and limit the number of months for such assistance. This way all staff are treating households equitably.

**65. Are mortgage payments allowed under 2019-2020 Discretionary and/or CARES funds?**

Yes, it is allowable with CSBG funds to avoid homelessness. First, many lenders are offering delayed or reduced monthly payments during this pandemic—tacking on the balance to the end of the contracts so that people don't lose their homes. Lenders are advertising to call them for this. The first action, should be for clients to contact their lender and make arrangements. Second, there are other programs who are receiving funds to address this issue---partner with them. Third, it should be limited to avoiding homelessness.

# Texas Department of Housing and Community Affairs

## COVID-19 Frequently Asked Questions

Updated March 8, 2021

**66. If mortgage statement includes taxes and insurance, can we still pay full mortgage payment?**

Yes, in order to avoid risk of homelessness, the full monthly payment may be paid. Retain a copy of the mortgage statement in the client file.

**67. If we choose a limitation on payment of rent, how should we handle if their current rental is over that limit?**

Rental assistance is for avoiding homelessness. If a partial payment will not avoid eviction, then you will need to leverage funds with partners, or have the client cover the difference, so that the assistance provided is effective. If you are considering limiting the dollar amount, HUD rent limits may be a good source for determining reasonable thresholds: <https://www.hudexchange.info/programs/home/home-rent-limits/>

**68. If funding is limited for rental assistance, after you serve priority populations, can we serve additional people using a lottery system since there isn't enough funding for all?**

This is an agency-level decision. Establish a written COVID-19 procedure for how this will be handled and then follow it.

**69. TDHCA compliance division asked during previous monitoring for lease agreements so it is highly suggested to obtain lease agreements for the files.**

That is correct. You are to maintain a copy of the client's lease agreement or mortgage statement in the file. Payment is to be made directly to the landlord/owner or mortgage company.

**70. If doing rental assistance, are we required to follow fair housing standards of HUD that we are required to follow for HOME programs?**

No, the service is to prevent homelessness. You must have a copy of the client's lease agreement and make the payment directly to the landlord/owner.

**71. If a client is requesting rental assistance and they are behind 6 months, all past due rent is not COVID-related, can we catch them up with CARES funds?**

Remember that CARES assistance shall be provided for only COVID-19 impacts; therefore, limit the assistance to only the time period when the client lost employment or reduced hours as a result of the pandemic. Since this client was behind well before COVID-19, you could provide assistance under your regular CSBG contract if that is an acceptable policy at your particular organization.

**72. Can we support our 211 partner with CSBG CARES funds?**

You cannot give money without oversight and reporting the uses, services, or outcomes. If 211 needs additional staff, your agency staff could assist with provision of referral activities.

**73. How will the CARES funds be allocated and how long do we have to expend these funds?**

The Department will use our standard CSBG allocation formula for these funds. The full award amount for each Subrecipient will be issued in a one year contract, as it is anticipated that the most COVID-related needs will be emergency assistance and will diminish over time once the health disaster is lifted. The Department will consider extensions, if the need arises.

**74. Can you reiterate the deadline for the CSBG-Discretionary COVID contract?**

CSBG\_D COVID-19 Contracts (this is not a CARES Act contract) expire 8/31/2020.

**75. What will be the terms of the CARES grant?**

The contract term will be 3/27/20-7/31/21. Any assistance must be to a documented COVID-19 related need.

# Texas Department of Housing and Community Affairs

## COVID-19 Frequently Asked Questions

Updated March 8, 2021

### **76. What is the deadline for the CARES needs assessment?**

It is due, along with your CARES CAP and Budget, 30 days from receipt of your CSBG CARES Act Contract.

### **77. Are we required to have a public hearing on the CARES Act? Can the public hearing requirement be waived?**

No, you will not have to hold a public hearing for the CARES Budget. These funds are considered supplemental CSBG funds, AND there is currently a waiver of Texas Government Code 2105.058 regarding public hearings. It is a Best Practice to hold a public hearing for this budget, but it is not currently required.

### **78. Would unincorporated Bexar county and suburban cities qualify for CSBG funding?**

These areas are covered by the City of San Antonio CSBG which is for all of Bexar County

### **79. Does the CSBG application still apply for COVID-19 supplemental or are we able to use the Disaster tracking sheet that was sent out?**

Yes, an application is required for all households who receive any CSBG funds.

### **80. What about the CSBG Discretionary funds we received last year for TOP participants, will those funds still be available to those on case management who are needing help with tuition, food, employment supplies, and who have not necessarily been affected directly by the COVID-19?**

Yes.

### **81. Are we able to assist with internet service with the additional CSBG funds? This is a big need for those who have been laid off and need to view job postings and fill out online applications.**

If the client already has internet service, you may pay their provider for a limited number of months. If the client does not have existing internet service, you would need to properly procure such service, most likely using Small Purchase method, and properly document the most cost effective.

### **82. Can we purchase meals for Meals on Wheels if necessary?**

If a CSBG eligible entity has a Meals on Wheels program, CSBG funds can support the program in their budget as "CSBG Support for xxx Program." Persons who are being supported with the program must have a current CSBG application on file. If you are trying to support another non-profit that operates a Meals on Wheels program, again, you'll need a contract with that entity and amend your budget. Purchase of food is allowable for CSBG eligible households with whom you have a current application.

### **83. For the extended Organization Standards submission, are documents for the original window of September 30th?**

Yes, the extension is to provide you additional upload time. Only documentation for FY20 (October 1, 2019-September 30, 2020) is to be submitted.

### **84. Where is the new Organization Standards guide located?**

It may be found under the header "CSBG Organizational Standards," located here:

- <https://www.tdhca.state.tx.us/community-affairs/csbg/additional-requirements.htm>
  - [Organizational Standards Guide for Public and Private Eligible Entities \(PDF\) – Updated April 2020](#)

### **85. Can CSBG funds be used to pay for WAP training, once WAP TTA funds are expended?**

CSBG funds can only be used if it is identified as "CSBG Support for WX" direct client assistance in the CSBG budget. CSBG funds cannot pay for any administrative costs related to LIHEAP. Training is an administrative cost, therefore neither CSBG nor any other federal funds can be utilized to support LIHEAP administrative costs per the LIHEAP statute.

**Texas Department of Housing and Community Affairs**  
**COVID-19 Frequently Asked Questions**  
*Updated March 8, 2021*

**V. WAP**

**86. You stated DOE doesn't allow counting home as complete, is this the same as LIHEAP?**

Yes, LIHEAP is the same.

**87. Will the additional LIHEAP funds be for CEAP only or include WAP?**

100% CEAP. No WAP.

**88. Will the LIHEAP 2019 contract be combined with the LIHEAP 2020 contract?**

No. USHHS allows LIHEAP-WAP (and CEAP) contracts to be extended beyond the original 12 month contract period. TDHCA will continue to follow this process in order to ensure full program expenditures.

**89. Are you considering merging contracts to give us time to bring down CPU's and increase production after things improve?**

TDHCA has not made a final call on this option, but will evaluate the situation when appropriate.

**90. Will our 2020 WAP contracts be extended?**

The LIHEAP 2019 contracts have been extended until June 30, 2020. A decision has not been made on if LIHEAP 2020 contracts will be extended.

**91. Can we get to our 2020 DOE TT&A funds now? Can we use our 2020 T T&A if we have used all 2019?**

PY2020 DOE funds will not be available until July 1, 2020

**92. Can we pay with DOE T&TA funds to get CUE's online?**

Yes.

**93. Do you think the training offered can compensate a full month of work and or beyond?**

This will depend on local budgets and costs.

**94. Can training funds be used for lead recertification?**

Yes, and several providers may have an online Lead class for the recertification process.

**95. Speaking of 200%, will the new LIHEAP funds be using this income eligibility as well?**

No LIHEAP will remain at 150%, the maximum allowed by federal statute.

**96. If WAP personnel are repurposed for work in CEAP or CSBG what pool of money are they paid out of?**

Personnel will be paid by the programs/funding sources their activities support.

**97. For centers currently closed to the public and performing telephone-intake applications for CEAP & WAP, they are free to begin using the Client Signature Flexibility form, correct?**

Yes, the Client Signature Flexibility Form can be used when a client signature is unobtainable. For DOE-WAP applications, as long as income is listed on the application then a DIS does not need to be included in the client file.

**98. Should agencies consider reopening weatherization field operations amidst the COVID-19 pandemic in regards to the recent guidance?**

Field operation and activity for WAP staff remains a local decision. Prior to making decisions agencies are strongly encouraged to consider safety factors such as the following:

# Texas Department of Housing and Community Affairs

## COVID-19 Frequently Asked Questions

Updated March 8, 2021

- Severity of outbreak for their service area
- Existing health conditions of staff and clients
- Is there a safe work plan developed and in place
- Can the work scope be completed in a safe fashion

**99. We feel TDHCA has not provided guidance related to safe work practices. Are resources available from the Department to aid agencies in developing a safe work plan**

Resources continue to be available on the Departments website at the following location:

<https://www.tdhca.state.tx.us/community-affairs/covid19.htm>

We have chosen to provide information utilizing website links as information is being continuously updated. Only providing a snap shot of information could leave out recently updated or important safety information.

*Example of available resources (as of 4/29/2020):*

NASCSP link at <https://nascsp.org/coronavirus-resources/> contains the following:

- Safety Protocols
  - [Considerations for WAP Field Work](#) (NASCSP)
  - Webinar: “Managing WAP Safety” 4/23/20 – [Slides](#) | [Recording](#)
  - State Sample: Wyoming
    - [WY WAP COVID-19 Field Checklist](#)
    - [WAP Emergency Preparedness, Disaster & Continuity of Operations Guidance](#)
    - [Wyoming Safety Newsletter](#)
- National Association of Home Builders (NAHB)
  - [Poster of Protection Measures](#)
  - [Jobsite Safety Toolbox Talk](#)
  - [Additional Resources in English and Spanish](#)
- [OSHA Guidance on Preparing Workplaces for COVID-19](#)
- Potential screening tools for workers and clients
  - [Emory University- “Check your risk for COVID-19”](#)
  - Check your state Department of Health website as many have developed online tools.

**100. Since blower doors and duct blasters move air from different portions of the structure will the use of such diagnostic equipment still be a program requirement?**

Use of blower door and duct blaster diagnostic equipment are required by the program to accurately assess, model and document results. Evaluating risk, strategies for minimizing risk, and recommended safety precautions by the various resources provided, should be factored into the local decision of continuing or reopening weatherization field activities.

**101. Can we pay for our subcontractor's time while they attend training sessions or the virtual conference?**

No, TDHCA requirements will not allow paying for subcontractor’s time; however, a Sub grantee may pay for subcontractor training using T&TA funds as long as the training is necessary to meet DOE WAP work standards. Per WPN 20-1, in making the determination to pay for contractors’ training (not time), Subgrantee should secure a retention agreement in exchange for the training. The retention agreement should require that contractors will work in the Program for a specific amount of time that equates to the value of the costs associated with the T&TA provided. Examples of contractor/agency retention agreements can be found on EERE’s website under WPN 10-1 or can be obtained from the DOE PO by request.

# Texas Department of Housing and Community Affairs

## COVID-19 Frequently Asked Questions

Updated March 8, 2021

- 102. We are considering sending contractors to homes to repair/replace non-working ACs in vulnerable homes. We are thinking that is an essential construction. Does TDHCA have a recommendation on this?**

This decision is outside of the Department's purview. If you have specific questions about an activity, you should contact your legal counsel and/or you may ask TDEM to have certain functions determined as essential:

<https://tdem.texas.gov/essentialservices/>

GA-14 refers to the Texas Department of Emergency Management (TDEM) and the Department of Homeland Security descriptions of "essential services," found here:

[https://www.cisa.gov/sites/default/files/publications/CISA\\_Guidance\\_on\\_the\\_Essential\\_Critical\\_Infrastructure\\_Workforce\\_Version\\_2.0\\_Updated.pdf](https://www.cisa.gov/sites/default/files/publications/CISA_Guidance_on_the_Essential_Critical_Infrastructure_Workforce_Version_2.0_Updated.pdf)

## VI. BOARDS

- 103. For our Advisory Boards/Councils, will we be able to use Skype or WebEx to hold these meetings? If not, how do we get things approved, such as strategic plan?**

Governor Abbott issued guidance regarding the Open Meetings Act and waived certain requirements allowing Meetings to occur virtually. If you have questions you should check with your legal counsel or CAPLAW

- 104. Can we postpone our April board meeting until May?**

This is at the discretion of the Subrecipient. Please be sure to follow local procedures and bylaws.

## VII. REPORTING

- 105. Will the due date for the additional reporting be the 15th of each month as well?**

All reports will be due the 15<sup>th</sup> of the month.

- 106. It was stated that we need to report families in all contracts if they received services from that contract? Will we not report once to keep it an unduplicated count? Or am I to understand that a household who may be assisted under the regular contract and the COVID-19 contract will have to be data entered in both contracts?**

Unduplicated counts are reported by contract. The Department will need reports to be separate for CSBG, CSBG\_D COVID, and CSBG CARES Act.

We will be reporting under a different annual report for CARES Act.

- 107. What instructions do you have for us regarding pre-award costs out of CSBG/CSBG\_D for charging CSBG CARES when received?**

In addition to having clear documentation of COVID-19 related need for each expense, and to ensure no double dipping, Subrecipients are to report any adjustments from their current contracts MER as an expense that will match on their CARES contracts MER.

- 108. With previous CSBG, CSBG -D, CEAP contracts we only reported performance on one contract? Why the change that we report on each performance report?**

The Department must track COVID related assistance by contract. Federal requirements require that the Department issue separate contracts for CARES and must account for funding and performance under those CARES contracts.

**Texas Department of Housing and Community Affairs**

**COVID-19 Frequently Asked Questions**

*Updated March 8, 2021*

**109. If we have been awarded CSBG-D contract, is the MPR in the contract system for reporting now?**

Yes, but first you must submit outcome targets to your assigned trainer to review and forward to reporting.